



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 04 2003

REPLY TO THE ATTENTION OF

DE-9J

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Fred Roberts
Crown Cork & Seal Company, Inc.
5201 Enterprise Boulevard
Toledo, Ohio 43612-3808

Re: U.S. EPA's November 18, 2002, Compliance Evaluation Inspection and
Crown Cork & Seal's January 10, 2003 Reply
OHD 042 159 285

Dear Mr. Roberts:

U.S. EPA has received your January 10, 2003, response letter. Your response rectifies and resolves all violations identified in U.S. EPA's December 17, 2002, letter. If you have any question regarding this matter, please contact Michael Beedle of my staff at 312.353.7922.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Little", is written over a horizontal line.

Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch

cc:
Gary Deutschman, OEPA, NWDO



CROWN CORK & SEAL

Inter-office Memorandum

DATE: JANUARY 10, 2003
TO: MICHAEL BEEDLE (EPA)
FROM: FRED W. ROBERTS/CROWN CORK & SEAL COMPANY, INC.
SUBJECT: RE: COMPLIANCE EVALUATION INSPECTION REPLY

CC: F. Lahner, C. Dotson, J. Kupa and To file.

Dear Mr. Beedle,

The following corrective actions have been taken to correct the violations incurred during your inspection on November 18, 2002.

- 1. Ohio Administrative Code (OAC) 3745-66-73 Management of containers:**
 - A. SOP'S were reviewed with the Coater operator's. Line supervisors will make this area a part of daily walk around inspections to avoid Re-occurrences.
- 2. Ohio Administrative Code (OAC) 3745-65-16 Personnel training:**
 - A. Training schedules for 2003 have been posted and include Type and Amount of training to be completed. Required training sign sheets will also be used for future training.
 - B. **HAZCOM/RCRA** had been completed for 2002, but did not fall within the 365day period.
HAZCOM/RCRA training was completed by Ashland Chemical on 10/01/02 and 10/02/02 2002.
Training for 2003 will be scheduled within the 365 period.
- 3. Ohio Administrative Code (OAC) 3745-65-52 Content Of Contingency Plan:**
 - A. A revised Emergency contact list has been provided to respective agencies. Records on file. Our Contingency Plan will be updated and communicated the all agencies on an annual basis or as they occur.

Any questions regarding this letter please contact Fred Roberts 419-727-9793 or John Kupa 419-727-9772.

Fred W. Roberts John Kupa

Fred Roberts / John Kupa
Crown Cork & Seal Company, Inc.
5201 Enterprise Blvd.
Toledo, Ohio 43612



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REGION 5
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DEC 17 2002

REPLY TO THE ATTENTION OF

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Fred Roberts
Crown Cork & Seal Company, Inc.
5201 Enterprise Boulevard
Toledo, Ohio 43612-3808

Re: Compliance Evaluation Inspection
Crown Cork & Seal
OHD 042 159 285

Dear Mr. Roberts:

On November 18, 2002, your facility located in Toledo, Ohio was inspected by United States Environmental Protection Agency (U.S. EPA) and Ohio EPA representatives. The purpose of the inspection was to evaluate compliance with applicable standards of the Resource Conservation and Recovery Act (RCRA) for large quantity generators of hazardous waste. Enclosed please find a copy of the Inspection Report dated December 6, 2002.

Based on this inspection U.S. EPA has determined that Crown Cork & Seal has violated the following requirements:

- Ohio Administrative Code (OAC) 3745-66-73 Management of containers.
(A) A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste.

A drum containing hazardous waste was observed to be without its drum ring secured during the facility tour. This violation was corrected during the inspection.

- OAC 3745-65-16 Personnel training.
(D) The owner or operator shall maintain the following documents and records at the facility:
 - (3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule.

This information was not in the Personnel Training records at the time of the inspection.

Additionally, the OEPA regulatory interpretation of OAC 3745-65-16 *Personnel training*, (C) *Facility personnel shall take part in an annual review of the initial training*, is that the training is to be conducted within 365 days. The October 2002 HAZCOM/RCRA training was not completed within 365 of the April 2001 training. This is not a violation for which we are citing you, but a matter we bring to your attention.

Also, OAC 3745-65-52 *Content of contingency plan*, requires that the Contingency Plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and Ohio EPA and local emergency response teams to coordinate emergency services, pursuant to rule 3745-65-37 of the Administrative Code. The Contingency Plan should contain the letters sent by the facility to the respective agencies and any return correspondence.

Crown Cork & Seal must rectify the identified violations and comply with the cited regulations. Please respond in writing, detailing how these violations have been corrected, and will be prevented in the future.

According to Section 3008(a) of RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken to comply with the above requirements. You should submit your response to Michael Beedle, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

Should you have any questions regarding this letter and the identified violations, please contact Michael Beedle of my staff at 312.353.7922.

Sincerely yours,



Paul Little, Chief
Compliance Section #2
Enforcement & Compliance Assurance Branch

cc:
Gary Deutschman, OEPA, NWDO

**U.S. EPA
Compliance Evaluation
Inspection Report**

**Crown Cork & Seal Company, Inc.
OHD 042 159 285**

December 6, 2002

To: Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

From: Michael Beedle
Compliance Section 2

On November 18, 2002, I performed a compliance evaluation inspection at Crown Cork & Seal Company, Inc. (facility). The purpose of the inspection was to determine the facility's compliance with applicable hazardous waste regulations for large quantity generators. The inspection was a Federal Lead inspection.

INSPECTION REPORT

1 Facility Information

Crown Cork & Seal Company,
5201 Enterprise Boulevard
Toledo, Ohio 43612-3808
OHD 042 159 285

2 Date of Inspection

November 18, 2002

3 Participants

Michael Beedle, U.S. EPA, Region 5
Gary Deutschman, OEPA, NWDO

Fred Roberts, Crown Cork & Seal Company
John Kupa, Crown Cork & Seal

4 Facility Description

The facility coats steel coils. The coated steel is processed into metal can tops and bottoms for canned food storage at other facilities (not onsite). The coating properties depend on the food product to be stored. The coating prevents the canned food product from reacting with the steel. Crown generates cleaning solvents and solvent contaminated rags during its operations. The two hazardous waste streams are stored in 55 gallon drums. Crown generates 20-30 drums of hazardous waste a month. The waste is sent offsite for disposal approximately once a month. Crown also generates non-hazardous parts washer solvent and used oil.

5 Summary of the Inspection

I arrived at the facility at ~9am. I met with Messrs. Roberts and Kupa. Mr. Roberts described the facility and then led me on a tour of the facility. I viewed the container storage area. The drums were all labeled in accordance to DOT regulations and dated. The drum that was stored the longest was dated 10-28-2002. We then proceeded to two satellite accumulation drum storage areas. The drums were labeled as hazardous waste. One open-head drum did not have its drum ring on or attached. I considered this drum to be open. No one was adding or removing waste at that time of the inspection. (The ring was secured onto the drum by the end of the inspection.)

After the tour, Mr. Deutschman arrived at the facility and we both reviewed the required paperwork. Mr. Deutschman reviewed the manifests and personnel training. I reviewed the Contingency Plan, Preparedness and Prevention, LDR, and other general LQG requirements. We filled out the attached checklist as we reviewed the paperwork.

Mr. Deutschman's review of the Personnel Training records indicated that the annual refresher training did not occur within 365 days (April 2001 and October 2002 training dates). Furthermore, the amount of initial training employee to be given to each person filling a position was not in the Personnel Training records.

My review of the Contingency Plan found that Crown had recently updated the emergency coordinator to reflect personnel changes. Mr. Roberts and Mr. Kupa indicated the contingency plan was implemented in 2002, in response to a oven fire that further ignited the coating on steel coil being coated. Since this was a product fire and not a hazardous waste fire, no report was required to be filed with the OEPA.

6 Inspection Closeout

Mr. Deutschman and I summarized our findings of the training issues and closing the satellite drum. We then viewed the drum that was not closed during the tour, the drum had been closed during the paper work review.

ATTACHMENTS

- A. Inspection Checklist
- B. OTIS, TRI, and Company Web Printouts

ATTACHMENT A
Inspection Checklist

**RCRA HAZARDOUS WASTE GENERATOR
INSPECTION CHECKLIST**

Company: Crown Cork & Seal EPA ID#: _____
 Street: _____ City: _____
 County: _____ State: Ohio Zip: _____
 Mailing Address: _____
 (If different from above)
 Telephone: _____ Fax #: _____
 Owner/Operator: _____
 (If different from above)
 Street: _____
 City: _____ State: Ohio Zip: _____
 Inspection Date(s): Nov 18 2002 Time(s): 9:00 11:40
 Inspection Announced? ☐ Yes ☐ NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	<u>Gary D.</u>		
	<u>Michael Beebe</u>		
	<u>Fred Robert</u>		
Facility Representative:	<u>John Kupa</u>		

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input type="checkbox"/> Used Oil
	<input type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month
 SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month
 LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

POLLUTION PREVENTION

Note to the Inspector: This checklist has been developed to help the division in gathering general information about the pollution prevention (P2) practices that the company may have initiated or attempted to initiate. The checklist is also used to:

- Facilitate P2 discussions;
- Identify barriers to P2;
- Define the P2 universe;
- Identify the need for future P2 initiatives;
- Identify partnership opportunities; and
- Link companies with better P2 resources.

As a prelude to completing this checklist the inspector should use the following list of questions as a way to initiate a dialogue concerning P2:

1. Have you tried to reduce the volume of waste (hazardous and nonhazardous) that you generate?
2. What is the largest waste stream that you generate?
3. How important would it be to you to eliminate that waste stream?
4. Does your company understand the reduced regulatory burden and cost saving benefits that eliminating or reducing a waste stream can have?
5. Could you use better housekeeping practices to reduce the amount of waste that you generate?

If the company responds with one of the answers below, the appropriate box should be checked. If the company's response does not correspond to one of the options below, please record the answer in the space provided or in the remarks section.

1. Has the company undertaken any P2 activities to reduce the amount of hazardous waste generated? Yes ___ No ___ N/A ___ RMK# ___

a. *If so*, what has the company done to minimize hazardous waste generation?

- ☐ A change in the process resulting in less waste.
- ☐ A change in the product resulting in less waste.
- ☐ Use of fewer and less toxic hazardous raw materials.
- ☐ Better operations/improved housekeeping.
- ☐ On-site recycling/reuse of hazardous materials.
- ☐ Sending waste off-site for recycling/reuse.
- ☐ Other activities (specify): _____

b. *If so*, what hazardous wastes have been addressed?

- ☐ Solvents
- ☐ Paint related wastes

- ☐ Industrial process wastes (sludges, slags, contaminated waste waters, etc)
- ☐ Contaminated oils/hydraulic fluids
- ☐ Off-spec chemicals
- ☐ Fluorescent light bulbs
- ☐ Used batteries
- ☐ Shop rags
- ☐ Other (specify): _____

c. ***If not***, why hasn't the company considered P2?

- ☐ The company just never thought about it
- ☐ Lack of information about practical alternatives
- ☐ Lack of capital to make process changes
- ☐ Lack of internal management support
- ☐ The company does not generate enough hazardous waste to consider P2
- ☐ Other reason given (specify): _____

2. Does the company plan to do P2 activities in the future? Yes___ No___ N/A___ RMK#___
3. Would the company be interested in receiving additional information from Ohio EPA about P2? Yes___ No___ N/A___ RMK#___
4. Did you give the company information about P2 during the inspection? Yes___ No___ N/A___ RMK#___
5. Would the company like a P2 assessment? Yes___ No___ N/A___ RMK#___

If the company would like a P2 assessment done at their facility, the inspector must give the company representative a copy of the Pollution Prevention Assessments for Hazardous Waste Generators document and discuss it with them.

6. If the company does not want a P2 assessment, why not?

REMARKS

LARGE QUANTITY GENERATOR REQUIREMENTS

GENERAL REQUIREMENTS

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes ☐ No ☒ N/A ☐ RMK# ☐
2. Has the generator obtained an identification number? [3745-52-12] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Were annual reports filed with Ohio EPA on or before March 1st? [3745-52-41] Yes ☒ No ☐ N/A ☐ RMK# ☐
per John Kypre

WASTE IMPORT/EXPORT REQUIREMENTS

4. Does the generator import or export hazardous waste? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Has the generator notified U.S. EPA of export/import activity? [3745-52-53] Yes ☐ No ☐ N/A ☒ RMK# ☐
- b. Has the generator complied with special manifest requirements? [3745-52-54] Yes ☐ No ☐ N/A ☒ RMK# ☐
- c. For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55] Yes ☐ No ☐ N/A ☒ RMK# ☐
- d. Has an annual report been submitted to U.S. EPA? [3745-52-56] Yes ☐ No ☐ N/A ☒ RMK# ☐
- e. Are export related documents being maintained on-site? [3745-52-57] Yes ☐ No ☐ N/A ☒ RMK# ☐

GENERATOR CLOSURE REQUIREMENTS

5. Has the generator closed any <90-day accumulation unit(s) since the date of the last inspection? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐
- a. Describe the unit(s) which the generator has closed.
- b. Does closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)] Yes ☐ No ☐ N/A ☒ RMK# ☐

- c. Please provide a description of the documentation provided by the generator to demonstrate that closure was completed in accordance with the closure performance standards.

NOTE: *If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]*

REMARKS

No <90 area closed.

MANIFEST REQUIREMENTS

You must start this part of the inspection by telling the company representative about the certification statement on the hazardous waste manifest using the following question and statement:

Are you aware of what the statement that you sign on the manifest says? Yes ☒ No ☐

If the answer is no, show them what the statement says using a signed manifest.

NOTE: *While the statement is a certification that a P2 strategy is in place, signing the statement does not establish any legal obligations with which the company must comply. In other words, there is no violation of the hazardous waste rules if they sign the manifest and they don't have a program in place.*

1. Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

2. Have items (1) through (20) of each manifest been completed? [3745-52-20(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)]*

3. Does each manifest designate at least one permitted disposal facility? [3745-52-20(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].*

4. Since the date of the last inspection, has the transporter been unable to deliver a shipment of hazardous waste to the designated facility? If so: Yes ☐ No ☒ N/A ☐ RMK# ☐

a. Did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)] Yes ☐ No ☐ N/A ☒ RMK# ☐

5. Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐

6. Has the generator received a return copy of each completed manifest within 35 days of being accepted by the transporter? If not: Yes ☒ No ☐ N/A ☐ RMK# ☐

a. Did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)] Yes ☐ No ☐ N/A ☒ RMK# ☐

b. If the manifest was not received within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]

Yes ___ No ☐ N/A ☒ RMK# ___

1. Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]

Yes ☒ No ☐ N/A ___ RMK# ___

REMARKS

Parts Washer Solvent - Non-Haz - Safety Kleen Re-use
Liquid Paint Waste - Petro Chem FO05/D001 MEK
Waste Rags - Petro Chem FO05/D001 TOLUENE
Used Oil - BBC Environmental/Cousins

PERSONNEL TRAINING

1. Does the generator keep records required by 3745-65-16(D) including:
- a. Job titles, as they relate to hazardous waste management, and the name of each employee filling each job? Yes ☒ No ☐ N/A ☐ RMK#
 - b. Job descriptions, including requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position? Yes ☒ No ☐ N/A ☐ RMK#
 - c. Type and amount of both introductory and continuing training to be given to each person filling a position? Yes ☐ No ☒ N/A ☐ RMK# 1
 - d. Documentation that personnel have completed the training or job experience required under 3745-65-16(A)(B) & (C)? Yes ☒ No ☐ N/A ☐ RMK#
- NOTE:** *If the facility's business practices precludes written job titles/descriptions, they should be able to identify, by name, all personnel who are involved with hazardous waste management, and the training/experience that they receive initially and annually. Item 9 on the next page can be used to document that all necessary employees have been trained.*
2. Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK#
3. Does the personnel training program include instruction in the following areas to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with: [3745-65-16(A)(3)]
- a. Emergency procedures? Yes ☒ No ☐ N/A ☐ RMK#
 - b. Emergency equipment? Yes ☒ No ☐ N/A ☐ RMK#
 - c. Emergency systems? Yes ☒ No ☐ N/A ☐ RMK#
4. Does emergency training described in 3(a), (b) and (c) above include, *where applicable*: [3745-65-16(A)(3)(a-f)]
- a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment? Yes ☒ No ☐ N/A ☐ RMK#

- b. Key parameters for automatic waste feed cut-off systems? Yes ☐ No ☐ N/A ☒ RMK#
- c. Communication or alarm system? Yes ☒ No ☐ N/A ☐ RMK#
- d. Response procedures for fire/explosions? Yes ☒ No ☐ N/A ☐ RMK#
- e. Response to groundwater contamination incidents? Yes ☐ No ☐ N/A ☒ RMK#
- f. Shutdown procedures? Yes ☒ No ☐ N/A ☐ RMK#
5. Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)] Yes ☒ No ☐ N/A ☐ RMK#
6. Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)] Yes ☒ No ☐ N/A ☐ RMK#
7. Does the generator provide annual refresher training to employees? [3745-65-16(C)] Yes ☐ No ☒ N/A ☐ RMK# 2
8. Are training records for current personnel kept until closure of the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐ RMK#
9. Are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)] Yes ☒ No ☐ N/A ☐ RMK#
10. **Optional:** The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifests, etc.

Job Performed

Name of Employee

Date(s) Trained

JOHN KUPA - EHS COORDINATOR
FRED ROBERTS - EHS COORDINATOR

COURTNEY OPERATOR FILLS SAFETY LIGHT ACCUMULATION CONTAINERS (2 per shift x 3 shifts = 6)
MATERIAL HANDLER - MOVER H.W. DRUMS (3 or 4 employees)
CHAS DOTSON - PLANT SUPERINTENDENT OR FRED ROBERTS DO WEEKLY INSPECTIONS

REMARKS

Oct 1, 2002 - HAZCOM/RCRA
Feb 28, 2002 - monthly Safety - 7/01
NOV 4, 2002 - PPE - 3/01 & 9/01
NOV 6, 2002 - Fire Protection - 11/01 & 11/01
Aug 12, 2002 - MSD (Respirator)
May 28, 2002 - Hazard Communication 9/01
May 1, 2002 - 3/01

RCRA/HAZCOM April 2001

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

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3/2002

LQG1.3.2002.wpd

#1 - Amount of Training not on record.

#2 - TRAINING NOT CONDUCTED WITHIN 365 DAYS

CONTINGENCY PLAN

1. Does the generator have a contingency plan which describes the following: [3745-65-52(A) through (F)]
- a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Arrangements/agreements with emergency authorities? [3745-65-37] Yes ☒ No ☐ N/A ☐ RMK# ☐
did not recall seeing this in plan
- c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. A list of all emergency equipment, including: location, physical description and brief outline of capabilities? Yes ☒ No ☐ N/A ☐ RMK# ☐
- e. An evacuation plan for facility personnel where there is a possibility that evacuation may be necessary? Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

2. Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
3. Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
4. Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, failure to the plan or as required by the Director? [3745-65-54] Yes ☒ No ☐ N/A ☐ RMK# ☐

EMERGENCY COORDINATOR

5. Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan

6. Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:

Yes ___ No ☒ N/A ___ RMK# 1

a. Was the contingency plan implemented? [3745-65-51(B)]

Yes ☒ No ☐ N/A ___ RMK# ___

b. Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?

Yes ☒ No ☐ N/A ☒ RMK# ___

c. Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?

Yes ___ No ☐ N/A ☒ RMK# ___

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

REMARKS

#1 Product fire oven
or gas fire

PREPAREDNESS AND PREVENTION [3745-52-34(A)(4)]

1. Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]

Yes ☒ No ☐ N/A ☐ RMK# per Fred 16hr
2. Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste: [3745-65-32(A)(B)(C)(D)]
 - a. Internal alarm system?

Yes ☒ No ☐ N/A ☐ RMK# per Fred
 - b. Emergency communication device?

Yes ☒ No ☐ N/A ☐ RMK# per Fred
 - c. Portable fire control, spill control and decon equipment?

Yes ☒ No ☐ N/A ☐ RMK# per Fred
 - d. Water of adequate volume/pressure? city water

Yes ☒ No ☐ N/A ☐ RMK# per Fred
3. Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]

Yes ☒ No ☐ N/A ☐ RMK# per Fred
4. Are emergency equipment tests (inspections) recorded in a log or summary: [3745-65-33]

Yes ☒ No ☐ N/A ☐ RMK# per Fred
5. Do personnel have immediate access to a communication device when handling hazardous waste (*unless the device is not required under 3745-65-32*)? [3745-65-34]

Yes ☒ No ☐ N/A ☐ RMK# per Fred
6. Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]

Yes ☒ No ☐ N/A ☐ RMK# per Fred
7. Has the generator attempted to familiarize emergency authorities with possible hazards and facility layout? [3745-65-37(A)]

Yes ☒ No ☐ N/A ☐ RMK# per Fred

 - a. Where authorities have declined to enter into arrangements/agreements, has the generator documented such a refusal? [3745-65-37(B)]

Yes ☒ No ☐ N/A ☐ RMK# per Fred

REMARKS

GENERATOR ACCUMULATION

1. Has the generator accumulated hazardous wastes on-site in excess of 90 days without a permit or an extension from the director? [3745-52-34; ORC §3734.02(E)(F)] Yes ☐ No ☒ N/A ☐ RMK# ☐

SATELLITE ACCUMULATION AREA REQUIREMENTS [3745-52-34(C)(1)]

2. Does the generator ensure that satellite accumulation area(s):
- a. Are at or near a point of generation? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - b. Are under the control of the operator of the process generating the waste? Yes ☒ No ☐ N/A ☐ RMK# ☐
 - c. Do not exceed a total of 55 gallons of hazardous waste? Yes ☐ No ☒ N/A ☐ RMK# ☐
 - d. Do not exceed one quart of acutely hazardous waste at any one time? Yes ☐ No ☐ N/A ☒ RMK# ☐
 - e. Containers are marked with the words "Hazardous Waste" or other words identifying the contents? Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: The 55 gallon limit applies to the area itself, and not to each individual waste stream accumulated in the area. The inspector should refer to Ohio EPA's November 1994 Guidance on the Location of Satellite Accumulation Areas.

3. Is the generator accumulating hazardous waste(s) in excess of the amounts listed in either 2(c) or 2(d)? If so:
- a. Did the generator comply with 3745-52-34(A) or other applicable generator requirements within three days? Yes ☐ No ☐ N/A ☒ RMK# ☐
 - b. Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? Yes ☐ No ☐ N/A ☒ RMK# ☐

USE AND MANAGEMENT OF CONTAINERS

4. Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)] Yes ☒ No ☐ N/A ☐ RMK# ☐

5. Is the accumulation date on each container? [3745-52-34(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
6. Are hazardous wastes stored in containers which are:
- a. Closed (except when adding/removing wastes)? [3745-66-73(A)] Yes ☐ No ☒ N/A ☐ RMK# ☒
- b. In good condition? [3745-66-71] Yes ☒ No ☐ N/A ☐ RMK# ☐
- c. Compatible with wastes stored in them? [3745-66-72] Yes ☒ No ☐ N/A ☐ RMK# ☐
- d. Handled in a manner which prevents rupture/leakage? [3745-66-73(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
7. Is the container accumulation area(s) inspected weekly? [3745-66-74] (Note location in general information section of checklist) Yes ☒ No ☐ N/A ☐ RMK# ☐
- a. Are inspections recorded in a log or summary? [3745-66-74] Yes ☒ No ☐ N/A ☐ RMK# ☐
8. For ignitable and/or reactive hazardous waste(s):
- a. Are containers located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] Yes ☒ No ☐ N/A ☐ RMK# ☐
- b. Are containers stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] Yes ☒ No ☐ N/A ☐ RMK# ☐

PRE-TRANSPORT REQUIREMENTS

9. Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, -52-31 and -52-32(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐
10. Does each container <110 gallons have a completed hazardous waste label? [3745-52-32(B)] Yes ☒ No ☐ N/A ☐ RMK# ☐
11. Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33] Yes ☒ No ☐ N/A ☐ RMK# ☐

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REMARKS

#2 open head satellite drum without ring, solvent waste

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Page 14 of 14

3/2002

LQG1.3.2002.wpd

LDR REQUIREMENTS

1. Has the generator adequately evaluated all wastes to determine if they are restricted from land disposal? [3745-270-07(A)(1)] **If so:** Yes ☒ No ☐ N/A ☐ RMK# ☐

a. **For determinations based solely on knowledge of the waste:** Is supporting data retained on-site? [3745-270-07(A)(6)] Yes ☒ No ☐ N/A ☐ RMK# ☐

b. **For determinations based upon analytical testing:** Is waste analysis data retained on-site? [3745-270-07(A)(6)] Yes ☒ No ☐ N/A ☐ RMK# ☐

2. Has the generator determined each Ohio EPA hazardous waste code applicable to the waste? [3745-270-07(A)(2), see Table 1] Yes ☒ No ☐ N/A ☐ RMK# ☐

3. Has the generator determined the correct "treatability group(s)" (e.g., wastewater, non-wastewater, etc.)? [3745-270-07(A), Table 1] Yes ☒ No ☐ N/A ☐ RMK# ☐

4. Does the generator generate a characteristic hazardous waste? **If so:** Yes ☐ No ☐ N/A ☐ RMK# ☐

a. Have all underlying hazardous constituents (UHCs) been identified? [3745-270-09(A)] Yes ☐ No ☐ N/A ☒ RMK# ☒

NOTE: ☒ *If the waste is D001 non-wastewater treated by CMBST, RORGS, POLYM in Table 1 of Rule 3745-270-42 UHCs do not need to be identified.*

5. Does the generator generate listed waste(s) which also exhibit hazardous characteristics? [3745-270-09] **If so:** Yes ☒ No ☐ N/A ☐ RMK# ☐

a. Has the generator also identified the appropriate treatment standard(s) for the constituent(s) which cause the waste to exhibit a characteristic? [3745-270-09(A)] Yes ☒ No ☐ N/A ☐ RMK# ☐

NOTE: *The generator is not required to identify the treatment standard for the characteristic if the listing covers the associated characteristic (e.g., a F019/D007 hazardous waste - F019 being listed due to chromium content and D007 being the characteristic waste code for chromium). [See OAC Rule 3745-270-09(B)]*

6. Has the generator **correctly** determined if restricted wastes meet or exceed treatment standards? [3745-270-07(A)(1)] Yes ☐ No ☐ N/A ☒ RMK# ☐

7. Does the owner/operator ensure that restricted wastes or treatment residues are not diluted as a method of achieving/circumventing LDR treatment standards? [3745-270-03] Yes ☒ No ☐ N/A ☐ RMK#

NOTE: A generator may dilute a waste (that is hazardous only because it exhibits a characteristic) in a treatment system that discharges to waters of the State pursuant to an NPDES permit (§402 of CWA), that treats waste in a CWA equivalent treatment system, or that treats waste for the purposes of pre-treatment requirements under §307 of CWA, unless a method other than DEACT is specified or the waste is a D003 reactive cyanide wastewater or non-wastewater. [3745-270-03(B)]

8. Is combustion of any of the wastes identified in the Appendix to Rule 3745-270-03 occurring without meeting one or more of the criteria under Rule 3745-270-03(C) upon generation or after treatment? [3745-270-03(C)] Yes ☐ No ☒ N/A ☐ RMK#

9. Has the generator added iron to lead-containing hazardous waste in order to achieve LDR treatment standards for lead? [3745-270-03(D)] Yes ☐ No ☐ N/A ☒ RMK#

10. Does the facility have a case-by-case extension to the effective date to land dispose of hazardous waste? [3745-270-05] If so: Yes ☐ No ☐ N/A ☒ RMK#

a. The facility can dispose of hazardous waste in a on-site landfill or surface impoundment. [3745-270-05]

11. Does the facility have an extension to allow for a restricted waste to be land disposed? [3745-270-06] If so: Yes ☐ No ☐ N/A ☒ RMK#

a. The facility can land dispose of the waste. [3745-270-06]

12. Does the facility treat wastes that are otherwise prohibited from land disposal, in a surface impoundment? If so: Yes ☐ No ☐ N/A ☒ RMK#

a. Has the facility complied with 3745-270-04? Yes ☐ No ☐ N/A ☐ RMK#

REMARKS

NOTIFICATION AND CERTIFICATION REQUIREMENTS

12. If a generators' waste or contaminated soil does not meet the treatment standards, does the generator have the paperwork required in Column A of Table 1? [3745-270-07(A)(2)] Yes ☒ No ☐ N/A ☐ RMK# ☐
13. If a generators' waste or contaminated soil meets the treatment standard at the original point of generation, does the generator have the paperwork required in Column B of Table 1? [3745-270-07(A)(3)] Yes ☒ No ☐ N/A ☐ RMK# ☐
14. If a generators' waste is exempt (under 3745-270-05, 3745-270-06, national capacity or case-by-case variance, etc.) does the generator have the paperwork required in Column C of Table 1? [3745-270-07(A)(4)] Yes ☐ No ☐ N/A ☒ RMK# ☐
15. If a generator manages a lab pack containing hazardous waste using the alternative treatment standard in 3745-270-42, does the generator have the paperwork required in Column D of Table 1? [3745-270-07(A)(9)] Yes ☐ No ☐ N/A ☒ RMK# ☐
16. Does the generator produce a waste that is hazardous waste from the point of generation, but subsequently excluded from regulation under OAC 3745-51-02 through 3745-51-06? [3745-270-07(A)(7)] If so: Yes ☐ No ☐ N/A ☒ RMK# ☐
- a. Is a one-time notice placed in the facility's file stating such generation, subsequent exclusion or exemption, and disposition of the wastes? [3745-270-07(A)(7)] Yes ☐ No ☐ N/A ☐ RMK# ☐

NOTE: Examples include hazardous wastes discharged to a POTW or to a surface water under a NPDES permit. (See 270-07(A)(7))

17. Does the generator retain on-site a copy of all notices, certifications, demonstrations and waste analysis data for at least three years from the last shipment of waste sent off-site? [3745-270-07(A)(8)] Yes ☒ No ☐ N/A ☐ RMK# ☐

REMARKS

GENERATORS TREATING HAZARDOUS WASTE

1. Is treatment of hazardous waste occurring to meet the treatment standards in 3745-270-40? Yes ___ No ___ N/A ___ RMK# ___
2. If so, does the generator have a waste analysis plan containing the following requirements? [3745-270-07(A)(5)] Yes ___ No ☐ N/A ___ RMK# ___
- a. A detailed chemical and physical analysis of a representative sample of the wastes being treated? [3745-270-07(A)(5)(a)] Yes ___ No ☐ N/A ___ RMK# ___
- b. All information necessary to treat the waste(s) in accordance with the requirements of 3745-270, including the selected frequency? [3745-270-07(A)(5)(a)] Yes ___ No ☐ N/A ___ RMK# ___
3. Is the WAP on-site in the facility's files and available to inspectors? [3745-270-07(A)(5)(b)] Yes ___ No ☐ N/A ___ RMK# ___
4. Have the treated wastes met the applicable treatment standards in 3745-270-40? Yes ___ No ☐ N/A ___ RMK# ___
- NOTE:** *If the waste is a characteristic waste, which has been treated to render it non hazardous and subsequently sent to a solid waste landfill, proceed to question 7 & 8.*
5. Has the generator sent a notification and certification with the initial shipment of waste? [3745-270-07(A)(5)(c)] Yes ___ No ☐ N/A ___ RMK# ___
6. Does each notification/certification form completed, contain the information found in Table 1 of 3745-270-07? [3745-270-07(A)(5)(c)] Yes ___ No ☐ N/A ___ RMK# ___
7. Has the generator, who is treating a characteristic waste, submitted a notification and certification to the director which contains the following: Yes ___ No ☐ N/A ___ RMK# ___
- i. Name and address of the facility receiving the waste? [3745-270-09(D)(1)(a)] Yes ___ No ☐ N/A ___ RMK# ___
- ii. A description of the waste, including EPA hazardous waste numbers and treatability group, and UHCs? [3745-270-09(D)(1)(b)] Yes ___ No ☐ N/A ___ RMK# ___

NOTE: *If the waste will be treated and monitored for all UHCs then they do not need to be listed on the notice.*

8. Has the process/operation generating the waste or the solid waste landfill facility changed? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Has the notification and certification been updated in the generators and treaters files? [3745-270-09(D)] Yes ___ No ☐ N/A ___ RMK# ___
- b. Has the director been notified of such changes? [3745-270-09(D)] Yes ___ No ☐ N/A ___ RMK# ___

NOTE: The director need only be notified on an annual basis but no later than December 31.

9. Is the facility treating contaminated soil using the alternative treatment standards in 3745-270-49? If so: Yes ___ No ___ N/A ___ RMK# ___
- a. Has the facility treated the contaminated soil to less than 10 times the Universal Treatment Standards or has a 90% reduction in the total constituent concentrations occurred? [3745-270-49(C)] Yes ___ No ☐ N/A ___ RMK# ___
10. Does each notification/certification form completed, contain the information found in Table 1? [3745-270-07(A)(3)] Yes ___ No ☐ N/A ___ RMK# ___

NOTE: If the waste will be treated and monitored for all constituents, there is no need to put them all on the LDR notice.

REMARKS

HAZARDOUS DEBRIS

1. Does the material in question meet the definition of hazardous debris as defined in rule 3745-270-02(A)(3)? Yes___ No___ N/A___ RMK#___
2. Is the hazardous debris being treated to the waste specific treatment standard in 3745-270-40 to 3745-270-49? (If yes, use the generator checklist.) Yes___ No___ N/A___ RMK#___
3. Is the hazardous debris being treated by the alternative treatment standards in 3745-270-45? If so: Yes___ No___ N/A___ RMK#___
- a. Has the debris or mixtures of debris been treated for each contaminant subject to treatment (toxicity, listed waste and cyanide reactive debris) using one or more of the treatment technologies found in Table 1 in 3745-270-45? [3745-270-45(A)] Yes___ No ☐ N/A___ RMK#___
- NOTE:** *If immobilization has been used in a treatment train, it must be the last treatment technology used.*
4. Was the hazardous debris a listed waste treated by an immobilization technology in Table 1? [3745-270-45(A)(1)] If so: Yes___ No___ N/A___ RMK#___
- a. Was immobilization the last treatment technology used? [3745-270-45(A)(3)] Yes___ No ☐ N/A___ RMK#___
5. Is the waste a PCB waste under 40 CFR Part 761? If so: Yes___ No___ N/A___ RMK#___
- a. Has the waste been treated to the most stringent standard in 40 CFR 761 or 270? [3745-270-45(A)(5)] Yes___ No ☐ N/A___ RMK#___
6. Has the residue from the treatment of hazardous debris been disposed of in accordance with 3745-270-40 to 3745-270-49? [3745-270-45(D)] Yes___ No ☐ N/A___ RMK#___
7. Does the owner/operator of a treatment facility that claims the debris is excluded under 3745-51-03(F)(1) maintain the following information? Yes___ No___ N/A___ RMK#___
- a. Records of all inspections, evaluations, and analyses of treated debris? [3745-270-07(D)(3)(a)] Yes___ No___ N/A___ RMK#___

- b. Records of key operating parameters of the treatment unit? [3745-270-07(D)(3)(b)] Yes ___ No ☐ N/A ___ RMK#___
- c. A certification statement for each shipment of treated debris? (See 270-07(D)(3)(c) for exact wording) [3745-270-07(D)(3)(c)] Yes ___ No ☐ N/A ___ RMK#___
8. Does the notifications and certifications of an owner/operator who first claims the debris is excluded under 3745-51-03(F) have the following information? [3745-270-07(D)(3)] Yes ___ No ☐ N/A ___ RMK#___
- a. Name and address of licensed solid waste landfill receiving the treated debris? [3745-270-07(D)(1)(a)] Yes ___ No ___ N/A ___ RMK#___
- b. Description of hazardous debris as initially generated with applicable waste codes? [3745-270-07(D)(1)(b)] Yes ___ No ☐ N/A ___ RMK#___
- c. Technology used from Table 1? [3745-270-07(D)(1)(c)] Yes ___ No ☐ N/A ___ RMK#___
9. Has the above notification been sent to the director? [3745-270-07(D)(1)] Yes ___ No ☐ N/A ___ RMK#___

REMARKS

TREATING FACILITIES

1. Does the treating facility test waste according to their waste analysis plan as required in 3745-54-13 or 3745-65-14? [3745-270-07(B)] Yes ___ No ☐ N/A ___ RMK# ___
 2. Has a one-time notification been sent with the initial shipment of waste or contaminated soil to the land disposal facility? [3745-270-07(B)(3)] Yes ___ No ☐ N/A ___ RMK# ___
- Note:** *No further notification is necessary until such time that the waste changes or the receiving facility changes.*
3. Does the one-time notification and certification contain the information listed in Table 2 of 3745-270-07? [3745-270-07(B)(3)] Yes ___ No ☐ N/A ___ RMK# ___
 4. Are wastes or treatment residues being sent to another TSD to be further managed? **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Has the facility complied with the generator notification/certification requirements? [Table 1, 3745-270-07(B)(5)] Yes ___ No ☐ N/A ___ RMK# ___
 5. Are recyclable materials used in a manner constituting disposal and subsequently subject to 3745-58-30? **If so:** Yes ___ No ___ N/A ___ RMK# ___
 - a. Has the treatment facility (recycler) sent a notification (found at 3745-270-07(B)(4)), excluding the manifest number, with each shipment of waste? [3745-270-07(B)(6)] Yes ___ No ☐ N/A ___ RMK# ___
 - b. Has the treatment facility (recycler) sent a certification found in 3745-270-07(B)(4) [3745-270-07(B)(6)] Yes ___ No ☐ N/A ___ RMK# ___
 - c. Has a copy of the notification and certification been sent to the director? [3745-270-07(B)(6)] Yes ___ No ☐ N/A ___ RMK# ___
 6. Does the recycling facility maintain records of the name and location of each entity receiving the hazardous waste-derived products? [3745-270-07(B)(6)] Yes ___ No ☐ N/A ___ RMK# ___
 7. Does the owner or operator of any land disposal facility disposing of waste subject to regulation under 3745-270 have: Yes ___ No ___ N/A ___ RMK# ___

- a. Copies of all notices and certifications required in 3745-270? Yes ___ No ☐ N/A ___ RMK#___
- b. Test results indicating all waste, extracts of waste or treatment residue are in compliance with 3745-270-40 to 3745-270-49? Yes ___ No ☐ N/A ___ RMK#___
- c. Followed the testing frequency specified in the facilities WAP? Yes ___ No ☐ N/A ___ RMK#___

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REMARKS

ATTACHMENT B

OTIS, TRI and Company Web Printouts

Detailed Facility Report

Report
ErrorData
Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 11/13/2002
US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110000384218	CROWN CORK & SEAL COMPANY INCORPORATED	5201 ENTERPRISE BLVD.	TOLEDO	OH	43612
RCRA	BRS	OHD042159285	CROWN CORK & SEAL CO INC	5201 ENTERPRISE BLVD	TOLEDO	OH	43612
RCRA	RCR	OHD042159285	CROWN CORK & SEAL CO INC	5201 ENTERPRISE BLVD	TOLEDO	OH	43612
EP313	TRI	43612TLDPL5201E	CROWN CORK & SEAL CO. INC.	5201 ENTERPRISE BLVD.	TOLEDO	OH	43612

Facility Characteristics

Data Dictionary

Statute	Source ID	Facility Status	Permit Expiration Date	Lat/Long	Indian Lands?	Primary SIC	Secondary SICs
	110000384218			LRT lat: 41.7115 LRT long: -83.5185	NA		
RCRA	OHD042159285	LQG		lat: 4.2401 long: -83.5214	No	3479	
EP313	43612TLDPL5201E			lat: 41.7083 long: -83.5167	NA	3479	

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	RECAP Insp. Last 05 Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
RCRA	OHD042159285	1	12/01/1999	0	\$00

Inspection History (05 years)

Data Dictionary

Statute	Source ID	Inspection Type	Lead Agency	Date
RCRA	OHD042159285	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	12/01/1999

Entries in *italics* are not considered inspections in Reporting for Enforcement and Compliance Assurance Priorities (RECAP) official counts.

Compliance Summary Data

Data Dictionary

Statute	Source ID	Current SNC/HPV?	Current Quarter	Description	Qtrs in NC (of 8)
RCRA	OHD042159285	NO	Jul-Sep02		0

Two Year Compliance Status by Quarter

Data Dictionary

Statute	Source ID	QTR1	QTR2	QTR3	QTR4	QTR5	QTR6	QTR7	QTR8
- No data records returned.									

Formal Enforcement Actions (05 year history)

Data Dictionary

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

EPA Enforcement Cases (05 year history)

Data Dictionary

Primary Law/Section	Case Number	Case Type	Case Name	Issued/Filed Date	Settlement Date	Penalty	SEP Cost
- No data records returned.							

History of Reported Chemicals Released in Pounds per Year at Site:43612TLDPL5201E

Data Dictionary

Chemical releases reported to TRI are provided for context and are not associated with non-compliance for that facility.

Year	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
1992	8,100				8,100	11,000	19,100
1993	166,550				166,550	50,205	216,755
1994	424,880				424,880	48,067	472,947
1995	363,769				363,769	34,968	398,737
1996	226,212				226,212	27,705	253,917
1997	217,794				217,794	26,690	244,484
1998	228,902				228,902	29,430	258,332
1999	359,830				359,830	32,855	392,685
2000	264,000				264,000	43,505	307,505

TRI Total Releases and Transfers by Chemical and Year

Chemical releases and transfers are in pounds except where otherwise noted.

Chemical Name	1992	1993	1994	1995	1996	1997	1998	1999	2000
CHROMIUM COMPOUNDS(E			5,410	755	1,005	405	230	855	505
CERTAIN GLYCOL ETHER	3,150	88,255	140,896	70,859	28,126	44,760	27,976	31,000	29,000
FORMALDEHYDE						360	223	230	
N-BUTYL ALCOHOL		4,800	7,479	3,577	1,307	2,078	1,533	1,400	2,200
METHYL ETHYL KETONE	15,950	70,950	175,989	195,543	142,732	103,850	148,344	230,900	178,300
NAPHTHALENE			9,436	12,400	8,888	9,150	8,943	14,000	9,800
1,2,4-TRIMETHYLBENZE		1,450	1,887	2,480	1,777	1,830	1,789	2,800	2,400
ETHYLBENZENE		11,300	17,402	8,677	3,107	5,067	3,123	3,100	2,900
METHYL ISOBUTYL KETO			4,890	6,484	4,851	5,163	4,772	8,400	6,900
TOLUENE			49,500	68,220	51,566	54,315	50,520	89,000	61,000
XYLENE (MIXED ISOMER		40,000	60,058	29,742	10,558	17,506	10,879	11,000	14,500

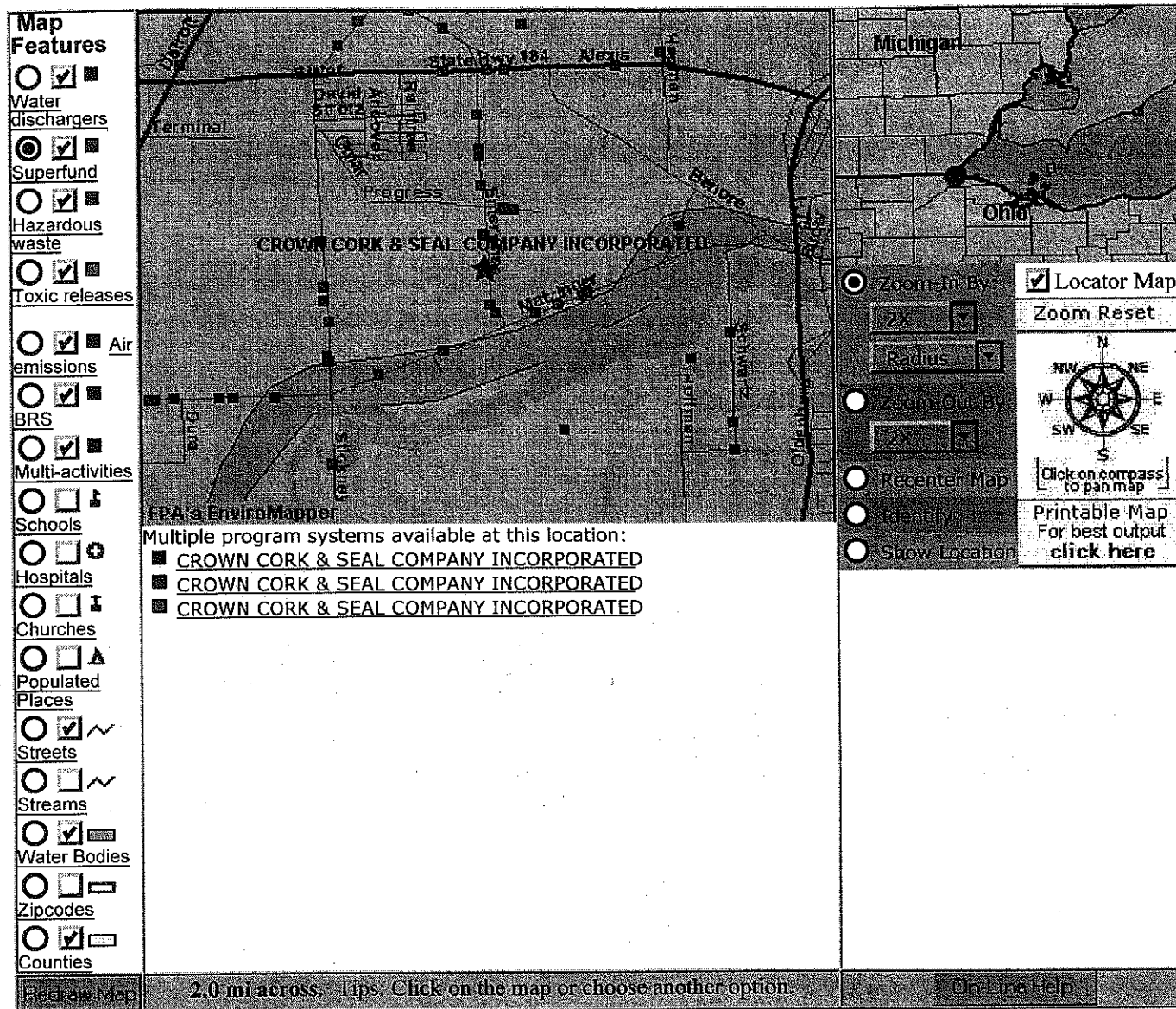
Demographic Profile of Surrounding Area (3 Miles) Switch to 1 Mi 5 Mi

Data Dictionary

This section is to provide context regarding the community setting of the facility. No relationship between this information, and other data included in this report is implied. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table(LRT) when available. N/A = Not yet available from the Census Bureau for 2000 Census.

Radius of Area:	3 Miles	Land Area:	89.09%	Households in area:	N/A
Center Latitude:	41.7115	Water Area:	10.91%	Housing units in area:	26,899
Center Longitude:	-83.5185	Population Density:	2310.13/sq. mi.	Households On Public Assistance:	N/A
Total Persons:	62,685	Percent Minority:	27.44%	Persons Below Poverty Level:	N/A

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	47,049 (75.06%)	Child 5 years and less:	4,646 (7.41%)
African-american:	12,294 (19.61%)	Minors 17 years and younger:	17,624 (28.12%)
Hispanic-Origin:	3,444 (5.49%)	Adults 18 years and older:	44,840 (71.53%)
Asian/Pacific Islander:	273 (0.44%)	Seniors 65 years and older:	4,774 (7.62%)
American Indian:	232 (0.37%)		
Other race:	2,837 (4.53%)		



You can also zoom in by geography.

United States
Environmental Protection Agency

EnviroMapper

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[Feedback](#)

Map Features

☐ ☒ ☐ Water dischargers

☐ ☒ ☐ Superfund

☐ ☒ ☐ Hazardous waste

☐ ☒ ☐ Toxic releases

☐ ☒ ☐ Air emissions

☐ ☒ ☐ BRS

☐ ☒ ☐ Multi-activities

☐ ☐ ☐ Schools

☐ ☐ ☐ Hospitals

☐ ☐ ☐ Churches

☐ ☐ ☐ Populated Places

☐ ☒ ☐ Streets

☐ ☐ ☐ Streams

☐ ☒ ☐ Water Bodies

☐ ☐ ☐ Zipcodes

☐ ☒ ☐ Counties

☐ Zoom In By

2X

☐ Zoom Out By

2X

☐ Recenter Map

☐ Identify

☐ Show Location

☒ Locator Map

Zoom Reset

Click on compass to pan map

Printable Map

For best output [click here](#)

Redraw Map

4.0 mi across. Tips: Click on the map or choose another option.

On-line Help

You can also zoom in by geography.

*Contacted State Nov Inspection***IDEA Detailed Facility Report**Report
ErrorData
Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 08/12/2002

Facility Permits and Identifiers

► Interpreting table data.

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110000384218	CROWN CORK & SEAL COMPANY INCORPORATED	5201 ENTERPRISE BLVD.	TOLEDO	OH	43612
RCRA	BRS	OHD042159285	CROWN CORK & SEAL CO INC	5201 ENTERPRISE BLVD	TOLEDO	OH	43612
RCRA	RCR	OHD042159285	CROWN CORK & SEAL CO INC	5201 ENTERPRISE BLVD	TOLEDO	OH	43612
EP313	TRI	43612TLDPL5201E	CROWN CORK & SEAL CO. INC.	5201 ENTERPRISE BLVD.	TOLEDO	OH	43612

Facility Characteristics

► Interpreting table data.

Statute	Source ID	Facility Status	Permit Expiration Date	Lat/Long	Indian Lands?	Primary SIC	Secondary SICs
	110000384218			LRT lat: 41.7115 LRT long: -83.5185	NA		
RCRA	OHD042159285	LQG		lat: 4.2401 long: -83.5214	No		3479
EP313	43612TLDPL5201E			lat: 41.7083 long: -83.5167	NA		

Inspection and Enforcement Summary Data

► Interpreting table data.

Statute	Source ID	RECAP Insp Last 05 Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
RCRA	OHD042159285	1	12/01/1999	0	\$00

Inspection History (05 years)

► Interpreting table data.

Statute	Source ID	Inspection Type	Lead Agency	Date
RCRA	OHD042159285	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	12/01/1999

Entries in *italics* are not considered inspections in Reporting for Enforcement and Compliance Assurance Priorities (RECAP) official counts.**Compliance Summary Data**

► Interpreting table data.

Statute	Source ID	Current SNC/HPV?	Current Quarter	Description	Qtrs in NC (of 8)
RCRA	OHD042159285	NO	Apr-Jun02		0

Two Year Compliance Status by Quarter

► Interpreting table data.

Statute:Source ID	QTR1	QTR2	QTR3	QTR4	QTR5	QTR6	QTR7	QTR8
- No data records returned.								

Formal Enforcement Actions (05 year history)

► Interpreting table data.

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

EPA Civil Docket Cases (05 year history)

► Interpreting table data.

Primary Law/Section	Case Number	Case Type	Case Name	Issued/Filed Date	Settlement Date	Penalty	SEP Cost
- No data records returned.							

History of Reported Chemicals Released in Pounds per Year at Site:43612LDPL5201E

► Interpreting table data.

Chemical releases reported by TRI are not associated with non-compliance for that facility.

Year	Total Air Emissions	Surface Water Discharges	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers	Total Releases and Transfers
1992	8,100				8,100	11,000	19,100
1993	166,550				166,550	50,205	216,755
1994	424,880				424,880	48,067	472,947
1995	363,769				363,769	34,968	398,737
1996	226,212				226,212	27,705	253,917
1997	217,794				217,794	26,690	244,484
1998	228,902				228,902	29,430	258,332
1999	359,830				359,830	32,855	392,685
2000	264,000				264,000	43,505	307,505

TRI Total Releases and Transfers by Chemical and Year

Chemical releases and transfers are in pounds except where otherwise noted.

Chemical Name	1992	1993	1994	1995	1996	1997	1998	1999	2000
CHROMIUM COMPOUNDS(E)			5,410	755	1,005	405	230	855	505
CERTAIN GLYCOL ETHER	3,150	88,255	140,896	70,859	28,126	44,760	27,976	31,000	29,000
FORMALDEHYDE						360	223	230	
N-BUTYL ALCOHOL		4,800	7,479	3,577	1,307	2,078	1,533	1,400	2,200
METHYL ETHYL KETONE	15,950	70,950	175,989	195,543	142,732	103,850	148,344	230,900	178,300
NAPHTHALENE			9,436	12,400	8,888	9,150	8,943	14,000	9,800
1,2,4-TRIMETHYLBENZE		1,450	1,887	2,480	1,777	1,830	1,789	2,800	2,400
ETHYLBENZENE		11,300	17,402	8,677	3,107	5,067	3,123	3,100	2,900
METHYL ISOBUTYL KETO			4,890	6,484	4,851	5,163	4,772	8,400	6,900
TOLUENE			49,500	68,220	51,566	54,315	50,520	89,000	61,000
XYLENE (MIXED ISOMER)		40,000	60,058	29,742	10,558	17,506	10,879	11,000	14,500

Demographic Profile of Surrounding Area

► Interpreting table data.

This section is to provide context regarding the community setting of the facility. No relationship between this information, and other data included in this report is implied. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table(LRT) when available. N/A = Not yet available from the Census Bureau for 2000 Census.

Radius of Area:	3 Miles	Land Area:	89.09%	Households in area:	N/A
Center Latitude:	41.7115	Water Area:	10.91%	Housing units in area:	26,899
Center Longitude:	-83.5185	Population Density:	2310.13/sq. mi.	Households On Public Assistance:	N/A
Total Persons:	62,685	Percent Minority:	27.44%	Persons Below Poverty Level:	N/A

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	47,049 (75.06%)	Child 5 years and less:	4,646 (7.41%)
African-american:	12,294 (19.61%)	Minors 17 years and younger:	17,624 (28.12%)
Hispanic-Origin:	3,444 (5.49%)	Adults 18 years and older:	44,840 (71.53%)
Asian/Pacific Islander:	273 (0.44%)	Seniors 65 years and older:	4,774 (7.62%)
American Indian:	232 (0.37%)		
Other race:	2,837 (4.53%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown	Households (%)
Less than 9th grade	N/A	Less than \$15,000	N/A
9th-12th grades	N/A	\$15,000-\$25,000	N/A
High School Diploma	N/A	\$25,000-\$50,000	N/A
Some College/2-yr	N/A	\$50,000-\$75,000	N/A
B.S./B.A. or more	N/A	Greater than \$75,000	N/A

Please Note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

Map It

This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: RCRAInfo : 07/19/2002.

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U.S. Environmental Protection Agency Toxics Release Inventory (TRI)

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Envirofacts Report

Query executed on AUG-12-2002
Results are based on data extracted on MAY-23-2002

Click on "View Facility Information" to view EPA Facility information for the facility.

<u>Facility Name:</u>	CROWN CORK & SEAL CO. INC.	<u>Mailing Name:</u>	CROWN CORK & SEAL CO. INC.	
<u>Address:</u>	5201 ENTERPRISE BLVD. TOLEDO OH 43612	<u>Mailing Address:</u>	5201 ENTERPRISE BLVD. TOLEDO OH 43612	
<u>County:</u>	LUCAS	<u>Region:</u>	5	
<u>Facility Information:</u>	View Facility Information	<u>TRI ID:</u>	43612TLDPL5201E	<u>DUNS Number:</u>
<u>TRI Preferred Latitude:</u>	41.708333	<u>TRI Preferred Longitude:</u>	83.516667	
<u>Public Contact:</u>	WILLIAM D. LAHNER	<u>Phone:</u>	4197278201	
<u>Parent Company:</u>	CROWN CORK & SEAL CO. INC.	<u>Parent DUNS:</u>	002282341	

SIC Codes for 2000

SIC CODE	SIC DESCRIPTION
3479	COATING, ENGRAVING, AND ALLIED SERVICES, NOT ELSEWHERE CLASSIFIED

The above information comes from 2000, which is the latest reporting year on file for this facility. The earliest year on file for this facility is 1987.

Map this facility

Map this facility using one of Envirofact's mapping utilities.

Total Aggregate Releases of TRI Chemicals to the Environment:

For all releases estimated as a range, the mid-point of the range was used in these calculations. This table summarizes releases reported by the facility. NR - signifies nothing reported by this facility for the corresponding medium.

Total Aggregate Releases of TRI Chemicals excluding Dioxin and Dioxin-like Compounds

(Measured in Pounds)

Media	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989
Air Emissions	264000	359830	228902	217794	226212	363769	424880	166550	8100	NR	376815	230375
Surface Water Discharges	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	264000	359830	228902	217794	226212	363769	424880	166550	8100	NR	376815	230375
Transfer Off-Site to Disposal	500	850	225	400	1000	755	5405	NR	NR	NR	6341	6281
Total Releases	264500	360680	229127	218194	227212	364524	430285	166550	8100	NR	383156	236656

Graphic Summary of this Table

Total Aggregate Releases of Dioxin and Dioxin-like Compounds
(Measured in Grams)

Media	2000	1999	1998	1997	1996	1995	1994	1993	1992	1991	1990	1989	1
Air Emissions	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Surface Water Discharges	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Releases to Land	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Underground Injection	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total On-Site Releases	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Transfer Off-Site to Disposal	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Total Releases	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

Graphic Summary of this Table

TRI Chemicals Reported on Form A:

Please note that there were no chemicals reported on Form A for this facility

NOTE:

All chemicals reported below have release or transfer amounts greater than zero. To see a list of all chemicals reported by this facility [click here](#).

Names and Amounts of Chemicals Released to the Environment by Year.

For all releases estimated as a range, the mid-point of the range was used in these calculations. NR - signifies nothing reported for this facility by the corresponding medium. Rows with all "0" or "NR" values were not listed.

Chemical Name	Media	Unit Of Measure	2000	1999	1998	1997	1996	1995	1994	1
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	AIR FUG	Pounds	NR	0	0	0	0	387	508	
1,2,4-TRIMETHYLBENZENE (TRI Chemical ID: 000095636)	AIR STACK	Pounds	2400	2800	1789	1830	1777	2093	1379	1
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	AIR FUG	Pounds	NR	0	0	0	0	15584	37946	24
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	AIR STACK	Pounds	29000	31000	27976	44760	28126	55275	102950	64
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	DISP NON METALS	Pounds	500	850	225	400	1000	755	5405	
ETHYLBENZENE (TRI Chemical ID: 000100414)	AIR FUG	Pounds	NR	0	0	0	0	1945	4688	3
ETHYLBENZENE (TRI Chemical ID: 000100414)	AIR STACK	Pounds	2900	3100	3123	5067	3107	6732	12714	8
ETHYLBENZENE (TRI Chemical ID: 000100414)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
FORMALDEHYDE (TRI Chemical ID: 000050000)	AIR STACK	Pounds	NR	230	223	360	NR	NR	NR	
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	AIR FUG	Pounds	5300	6900	6259	4224	1907	31433	49495	21
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	AIR STACK	Pounds	130000	192000	112885	73341	114125	129897	83837	
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	AIR FUG	Pounds	NR	0	0	0	0	1018	1317	
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	AIR STACK	Pounds	6900	8400	4772	5163	4851	5466	3573	
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	AIR FUG	Pounds	NR	0	0	0	0	802	2015	1
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	AIR STACK	Pounds	2200	1400	1533	2078	1307	2775	5464	3
N-BUTYL ALCOHOL	DISP									

(TRI Chemical ID: 000071363)	NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
NAPHTHALENE (TRI Chemical ID: 000091203)	AIR FUG	Pounds	NR	0	0	0	0	1934	2542	
NAPHTHALENE (TRI Chemical ID: 000091203)	AIR STACK	Pounds	9800	14000	8943	9150	8888	10466	6894	
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
SODIUM HYDROXIDE (SOLUTION) (TRI Chemical ID: 001310732)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY) (TRI Chemical ID: 007664939)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
TOLUENE (TRI Chemical ID: 000108883)	AIR FUG	Pounds	NR	0	0	0	0	10640	13335	
TOLUENE (TRI Chemical ID: 000108883)	AIR STACK	Pounds	61000	89000	50520	54315	51566	57580	36165	
TOLUENE (TRI Chemical ID: 000108883)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	AIR FUG	Pounds	NR	0	0	0	0	6666	16179	11
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	AIR STACK	Pounds	14500	11000	10879	17506	10558	23076	43879	29
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	DISP NON METALS	Pounds	NR	NR	NR	NR	NR	NR	NR	

Discharge of Chemicals into Streams or Bodies of Water:

Please note that either there were no releases of chemicals into streams or bodies of water reported by this facility or the facility did not file a TRI form R for the years 1987 to 2000. Rows with Release Amount equal to "0" were not listed.

Transfer of Chemicals to Off-Site Locations other than POTWs:

Please note that transfer amounts are not included in release totals shown above. For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Total Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount	Transfer Site Name and Address	Type Of Waste Management
CERTAIN GLYCOL				PETROCHEM	

ETHERS (TRI Chemical ID: N230)	1993	Pounds	250	421 LYCASTE DETROIT, MI 48214	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1993	Pounds	5	CHEM MAT 18550 ALAN RD. WYANDOTTE, MI 48192	Energy Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1990	Pounds	24	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1989	Pounds	25	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1989	Pounds	22	LIMA BARREL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1988	Pounds	430	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1987	Pounds	1300	THE QUEEN CITY BARREL COMPANY 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1987	Pounds	1200	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Solvents/Organics Recovery
CERTAIN GLYCOL ETHERS (TRI Chemical ID: N230)	1987	Pounds	8645	PETRO-CHEM PROCESSING 421 LYCASTE ST. DETROIT, MI 48214	Solvents/Organics Recovery
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	2000	Pounds	250	SAFETY KLEEN 6125 N. PECATOCIA RD. PECATIONICA, IL 61063	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	2000	Pounds	250	ENVIRITE OF OHIO, INC. 2050 CENTRAL AVE., S.E. CANTON, OH 44707	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1999	Pounds	600	SAFETY KLEEN 6125 N. PECATOCIA RD. PECATIONICA, IL 61063	Landfill/Disposal Surface Impoundment
CHROMIUM				ENVIRITE OF OHIO, INC.	

COMPOUNDS (TRI Chemical ID: N090)	1999	Pounds	250	2050 CENTRAL AVE., S.E. CANTON, OH 44707	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1998	Pounds	215	LIDLAW ENVIRONMENTAL SERVICES OF IL 6125 N. PECATIOCIA RD. PECATIONICA, IL 61063	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1998	Pounds	5	ENVIRITE OF OHIO, INC. 2050 CENTRAL AVE., S.E. CANTON, OH 44707	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1998	Pounds	5	ENVOTECH 49350 N. SERVICE DRIVE BELLEVILLE, MI 48111	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1997	Pounds	5	CHEMICAL WASTE MANAGEMENT OF, INDIANA INC. 4363 ADAMS CENTER RD. FORT WAYNE, IN 46806	* Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1997	Pounds	385	LIDLAW ENVIRONMENTAL SERVICES, OF IL 6125 N. PECATIOCIA RD. PECATIONICA, IL 61063	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1997	Pounds	5	ENVOTECH 49350 N. SERVICE DR. BELLEVILLE, MI 48111	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1997	Pounds	5	ENVIRITE OF OHIO INC. 2050 CENTRAL AVE., S.E. CANTON, OH 44707	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1996	Pounds	250	CHEMICAL WASTE MANAGEMENT, OF INDIANA INC. 4363 ADAMS CENTER RD. FORT WAYNE, IN 46806	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1996	Pounds	750	LIDLAW ENVIRONMENTAL SERVICES, OF IL 6125 N. PECATIOCIA RD. PECATIONICA, IL 61063	Landfill/Disposal Surface Impoundment

CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1995	Pounds	5	CHEMICAL WASTE MANAGEMENT INC., W124 N9451 BOUNDARY RD. MENOMONEE FALLS, WI 53051	Other Land Disposal
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1995	Pounds	750	CHEM-MET SERVICES 18550 ALLEN ST. WYANDOTTE, MI 48192	Other Land Disposal
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1994	Pounds	5	CHEMICAL WASTE MANAGEMENT INC. 4636 ADAMS CENTER RD. FORT WAYNE, IN 46806	Landfill/Disposal Surface Impoundment
CHROMIUM COMPOUNDS (TRI Chemical ID: N090)	1994	Pounds	5400	CHEM-MET SERVICES 18550 ALLEN ST. WYANDOTTE, MI 48192	Landfill/Disposal Surface Impoundment
ETHYLBENZENE (TRI Chemical ID: 000100414)	1990	Pounds	100	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	2000	Pounds	43000	PETRO-CHEM PROCESSING 421 LYCASTE DR DETROIT, MI 48214	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1999	Pounds	32000	PETRO-CHEM PROCESSING 421 LYCASTE DR DETROIT, MI 48214	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	27700	PETRO-CHEM PROCESSING 421 LYCASTE DR DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1998	Pounds	1500	PETRO-CHEM PROCESSING 421 LYCASTE DR DETROIT, MI 48214	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1997	Pounds	18137	PETRO CHEM PROCESSING 421 LYCASTE DR. DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1997	Pounds	8148	PETRO CHEM PROCESSING 421 LYCASTE DR. DETROIT, MI 48214	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1996	Pounds	18423	PETRO CHEM PROCESSING 421 LYCASTE DR. DETROIT, MI 48214	Energy Recovery

METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1996	Pounds	8277	PETRO CHEM PROCESSING 421 LYCASTE DR. DETROIT, MI 48214	Incineration/Thermal Treatment
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1995	Pounds	23154	PETRO-CHEM PROCESSING 421 LYCASTE DR. DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1995	Pounds	11059	NORTRU RESOURCES 611 HILLGAN RD. DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1994	Pounds	42657	NORTV/PETRO CHEM. INC. 515 LYCASTLE RD. DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1993	Pounds	49700	PETROCHEM 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1993	Pounds	250	CHEM MAT 18550 ALAN RD. WYANDOTTE, MI 48192	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1992	Pounds	11000	PETROCHEM 421 LYCASTE DETROIT, MI 48214	Energy Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1990	Pounds	1400	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1989	Pounds	1500	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1989	Pounds	1400	LIMA BARREL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1989	Pounds	140	VAN WATERS & ROGERS INC. 30450 TRACY RD. WALBRIDGE, OH 43465	Unknown
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1988	Pounds	2300	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1987	Pounds	6200	THE GREEN CITY BARREL COMPANY 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown

METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1987	Pounds	18000	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Solvents/Organics Recovery
METHYL ETHYL KETONE (TRI Chemical ID: 000078933)	1987	Pounds	120000	PETRO-CHEM PROCESSING 421 LYCASTE ST. DETROIT, MI 48214	Solvents/Organics Recovery
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1990	Pounds	110	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1989	Pounds	190	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1989	Pounds	170	LIMA BARREL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1988	Pounds	300	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1987	Pounds	840	THE QUEEN CITY BARREL COMPANY 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1987	Pounds	740	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Solvents/Organics Recovery
METHYL ISOBUTYL KETONE (TRI Chemical ID: 000108101)	1987	Pounds	5400	PETRO-CHEM PROCESSING 421 LYCASTE ST. DETROIT, MI 48214	Solvents/Organics Recovery
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1990	Pounds	37	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1989	Pounds	80	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1989	Pounds	74	LIMA BARREL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1988	Pounds	190	QUEEN CITY BARREL CO. 1937 SOUTH ST.	Unknown

000071363)				CINCINNATI, OH 45204	
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1987	Pounds	780	THE QUEEN CITY BARREL COMPANY 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1987	Pounds	5700	PETRO-CHEM PROCESSING 421 LYCASTE ST. DETROIT, MI 48214	Solvents/Organics Recovery
N-BUTYL ALCOHOL (TRI Chemical ID: 000071363)	1987	Pounds	820	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Solvents/Organics Recovery
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	1990	Pounds	20	MICHIGAN DISPOSAL INC. 49350 N. SERVICE DR. BELLEVILLE, MI 48111	Solidification/Stabilization
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	1989	Pounds	24	VAN WATERS & ROGER INC. 30450 TRACY RD. WALBRIDGE, OH 43465	Unknown
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	1989	Pounds	250	MICHIGAN DISPOSAL INC. 49350 N. SERVICE DR. BELLEVILLE, MI 48111	Solidification/Stabilization
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	1988	Pounds	80	MICHIGAN DISPOSAL INC. 49350 N. SERVICE DR. BELLEVILLE, MI 48111	Solidification/Stabilization
PHOSPHORIC ACID (TRI Chemical ID: 007664382)	1987	Pounds	212	MICHIGAN DISPOSAL, INC. 49350 N. SERVICE RD. BELLEVILLE, MI 48111	Landfill/Disposal Surface Impoundment
SODIUM HYDROXIDE (SOLUTION) (TRI Chemical ID: 001310732)	1987	Pounds	400	NA	Unknown
SODIUM HYDROXIDE (SOLUTION) (TRI Chemical ID: 001310732)	1987	Pounds	9400	NA	Solidification/Stabilization
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY) (TRI Chemical ID: 007664939)	1990	Pounds	3300	CYANO-KEM 12345 SHAEFER HWY. DETROIT, MI 48277	Unknown

SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY) (TRI Chemical ID: 007664939)	1989	Pounds	36	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY) (TRI Chemical ID: 007664939)	1989	Pounds	750	LIMA BARRELL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	NO CODE OR DESCRIPTION PROVIDED BY FACILITY
TOLUENE (TRI Chemical ID: 000108883)	1990	Pounds	730	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
TOLUENE (TRI Chemical ID: 000108883)	1989	Pounds	500	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
TOLUENE (TRI Chemical ID: 000108883)	1989	Pounds	440	LIMA BARREL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
TOLUENE (TRI Chemical ID: 000108883)	1988	Pounds	480	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
TOLUENE (TRI Chemical ID: 000108883)	1987	Pounds	1500	THE QUEEN CITY BARREL COMPANY 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
TOLUENE (TRI Chemical ID: 000108883)	1987	Pounds	9900	PETRO-CHEM PROCESSING 421 LYCASTE ST. DETROIT, MI 48214	Solvents/Organics Recovery
TOLUENE (TRI Chemical ID: 000108883)	1987	Pounds	1400	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1990	Pounds	640	LIMA BARREL CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1989	Pounds	890	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1989	Pounds	790	LIMA BARREL & DRUM CO. 1140 E. FRANKLIN ST. LIMA, OH 45802	Unknown

XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1988	Pounds	3700	QUEEN CITY BARREL CO. 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1987	Pounds	6600	THE QUEEN CITY BARREL COMPANY 1937 SOUTH ST. CINCINNATI, OH 45204	Unknown
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1987	Pounds	44000	PETRO-CHEM PROCESSING 421 LYCASTE ST. DETROIT, MI 48214	Solvents/Organics Recovery
XYLENE (MIXED ISOMERS) (TRI Chemical ID: 001330207)	1987	Pounds	6000	INDUSTRIAL FUELS & RESOURCES 604 S. SCOTT ST. SOUTH BEND, IN 46624	Solvents/Organics Recovery

Summary of Waste Management Activites

Please note that chemical amounts shown here are not included in Total Aggregate Releases shown above.

Summary of Waste Management Activites excluding Dioxin and Dioxin-like Compounds (Measured in Pounds)

Year	On-Site Recycling	Off-Site Recycling	On-Site Energy Recovery	Off-Site Energy Recovery	On-Site Treatment	Off-Site Treatment	Total Amount
1999	0	0	0	0	4807000	32000	4839000
2000	0	0	0	0	4036000	43000	4079000
2001 (Projected)	0	0	0	0	4426000	38000	4464000
2002 (Projected)	0	0	0	0	4426000	38000	4464000

Summary of Waste Management Activites for Dioxin and Dioxin-like Compounds (Measured in Grams)

This facility did not report any waste management activites for Dioxin and Dioxin-like Compounds.

Chemicals Under Waste Management:

Please note that chemical amounts shown here are not included in the Total Aggregate Releases shown above. Transfers to Publicly Owned Treatment Works are listed on a seperate table.

Chemical Name	Year	Unit Of Measure	On-Site Recycling	Off-Site Recycling	On-Site Energy Recovery	Off-Site Energy Recovery	On-Site Treated	Off-Site Treated
1,2,4-TRIMETHYLBENZENE	1999	Pounds	0	0	0	0	26000	
	2000	Pounds	0	0	0	0	38000	
	2001 (Projected)	Pounds	0	0	0	0	32000	

	2002 (Projected)	Pounds	0	0	0	0	32000
CERTAIN GLYCOL ETHERS	1999	Pounds	0	0	0	0	1300000
	2000	Pounds	0	0	0	0	1200000
	2001 (Projected)	Pounds	0	0	0	0	1200000
	2002 (Projected)	Pounds	0	0	0	0	1200000
ETHYLBENZENE	1999	Pounds	0	0	0	0	150000
	2000	Pounds	0	0	0	0	130000
	2001 (Projected)	Pounds	0	0	0	0	140000
	2002 (Projected)	Pounds	0	0	0	0	140000
HYDROGEN FLUORIDE	1999	Pounds	0	0	0	0	27000
	2000	Pounds	0	0	0	0	15000
	2001 (Projected)	Pounds	0	0	0	0	21000
	2002 (Projected)	Pounds	0	0	0	0	21000
METHYL ETHYL KETONE	1999	Pounds	0	0	0	0	1700000
	2000	Pounds	0	0	0	0	1200000
	2001 (Projected)	Pounds	0	0	0	0	1500000
	2002 (Projected)	Pounds	0	0	0	0	1500000
METHYL ISOBUTYL KETONE	1999	Pounds	0	0	0	0	75000
	2000	Pounds	0	0	0	0	100000
	2001 (Projected)	Pounds	0	0	0	0	100000
	2002 (Projected)	Pounds	0	0	0	0	100000
N-BUTYL ALCOHOL	1999	Pounds	0	0	0	0	71000
	2000	Pounds	0	0	0	0	95000
	2001 (Projected)	Pounds	0	0	0	0	83000
	2002 (Projected)	Pounds	0	0	0	0	83000
NAPHTHALENE	1999	Pounds	0	0	0	0	128000
	2000	Pounds	0	0	0	0	88000
	2001 (Projected)	Pounds	0	0	0	0	100000
	2002 (Projected)	Pounds	0	0	0	0	100000
TOLUENE	1999	Pounds	0	0	0	0	800000
	2000	Pounds	0	0	0	0	560000
	2001 (Projected)	Pounds	0	0	0	0	680000
	2002 (Projected)	Pounds	0	0	0	0	680000
XYLENE (MIXED ISOMERS)	1999	Pounds	0	0	0	0	530000

	2000	Pounds	0	0	0	0	610000
	2001 (Projected)	Pounds	0	0	0	0	570000
	2002 (Projected)	Pounds	0	0	0	0	570000

Transfer of Chemicals to Publicly Owned Treatment Works (POTW):

Please note that transfer amounts are not included in the Total Aggregate Releases shown above. For all releases estimated as a range, the mid-point of the range was used in these calculations.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount
CHROMIUM COMPOUNDS	1994	Pounds	5
CHROMIUM COMPOUNDS	1996	Pounds	5
CHROMIUM COMPOUNDS	1997	Pounds	5
CHROMIUM COMPOUNDS	1998	Pounds	5
CHROMIUM COMPOUNDS	1999	Pounds	5
CHROMIUM COMPOUNDS	2000	Pounds	5
PHOSPHORIC ACID	1990	Pounds	500
SODIUM HYDROXIDE (SOLUTION)	1987	Pounds	950
SODIUM HYDROXIDE (SOLUTION)	1988	Pounds	250
SODIUM SULFATE (SOLUTION)	1987	Pounds	189759
SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)	1989	Pounds	3000

Publicly Owned Treatment Works (POTW) that Chemicals were Transferred to:

Chemical Name	Year	POTW Name and Address
1,2,4-TRIMETHYLBENZENE	1998	NA
1,2,4-TRIMETHYLBENZENE	1999	NA
1,2,4-TRIMETHYLBENZENE	2000	NA
CERTAIN GLYCOL ETHERS	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
CERTAIN GLYCOL ETHERS	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
CERTAIN GLYCOL ETHERS	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
CERTAIN GLYCOL ETHERS	1998	NA
CERTAIN GLYCOL ETHERS	1999	NA
CERTAIN GLYCOL ETHERS	2000	NA
		DIV. OF WATER RECLAMATION

CHROMIUM COMPOUNDS	1994	3900 NORTH SUMMIT ST. TOLEDO, OH 436113097
CHROMIUM COMPOUNDS	1995	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
CHROMIUM COMPOUNDS	1996	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
CHROMIUM COMPOUNDS	1997	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
CHROMIUM COMPOUNDS	1998	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
CHROMIUM COMPOUNDS	1999	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
CHROMIUM COMPOUNDS	2000	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
ETHYLBENZENE	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
ETHYLBENZENE	1998	NA
ETHYLBENZENE	1999	NA
ETHYLBENZENE	2000	NA
FORMALDEHYDE	1998	NA
FORMALDEHYDE	1999	NA
HYDROGEN FLUORIDE	1995	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
HYDROGEN FLUORIDE	1996	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
HYDROGEN FLUORIDE	1997	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
HYDROGEN FLUORIDE	1998	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
HYDROGEN FLUORIDE	1999	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
HYDROGEN FLUORIDE	2000	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
METHYL ETHYL KETONE	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
METHYL ETHYL KETONE	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
METHYL ETHYL KETONE	1990	CITY OF TOLEDO 3900 SUMMITT ST.

		TOLEDO, OH 43605
<u>METHYL ETHYL KETONE</u>	1998	NA
<u>METHYL ETHYL KETONE</u>	1999	NA
<u>METHYL ETHYL KETONE</u>	2000	NA
<u>METHYL ISOBUTYL KETONE</u>	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>METHYL ISOBUTYL KETONE</u>	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>METHYL ISOBUTYL KETONE</u>	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
<u>METHYL ISOBUTYL KETONE</u>	1998	NA
<u>METHYL ISOBUTYL KETONE</u>	1999	NA
<u>METHYL ISOBUTYL KETONE</u>	2000	NA
<u>N-BUTYL ALCOHOL</u>	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>N-BUTYL ALCOHOL</u>	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>N-BUTYL ALCOHOL</u>	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
<u>N-BUTYL ALCOHOL</u>	1998	NA
<u>N-BUTYL ALCOHOL</u>	1999	NA
<u>N-BUTYL ALCOHOL</u>	2000	NA
<u>NAPHTHALENE</u>	1998	NA
<u>NAPHTHALENE</u>	1999	NA
<u>NAPHTHALENE</u>	2000	NA
<u>PHOSPHORIC ACID</u>	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>PHOSPHORIC ACID</u>	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>PHOSPHORIC ACID</u>	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
<u>PHOSPHORIC ACID</u>	1994	DIV. OF WATER RECLAMATION 3900 NORTH SUMMIT ST. TOLEDO, OH 436113097
<u>PHOSPHORIC ACID</u>	1995	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097

<u>PHOSPHORIC ACID</u>	1996	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
<u>PHOSPHORIC ACID</u>	1997	DIV. OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 436113097
<u>PHOSPHORIC ACID</u>	1998	DIVISION OF WATER RECLAMATION 3900 N. SUMMIT ST. TOLEDO, OH 43611
<u>SODIUM HYDROXIDE (SOLUTION)</u>	1987	THE CITY OF TOLEDO 3900 SUMMIT TOLEDO, OH 43605
<u>SODIUM HYDROXIDE (SOLUTION)</u>	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>SODIUM SULFATE (SOLUTION)</u>	1987	THE CITY OF TOLEDO 3900 SUMMIT TOLEDO, OH 43605
<u>SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)</u>	1987	THE CITY OF TOLEDO 3900 SUMMIT TOLEDO, OH 43605
<u>SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)</u>	1988	THE CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)</u>	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>SULFURIC ACID (1994 AND AFTER "ACID AEROSOLS" ONLY)</u>	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
<u>TOLUENE</u>	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>TOLUENE</u>	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>TOLUENE</u>	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
<u>TOLUENE</u>	1998	NA
<u>TOLUENE</u>	1999	NA
<u>TOLUENE</u>	2000	NA
<u>XYLENE (MIXED ISOMERS)</u>	1988	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>XYLENE (MIXED ISOMERS)</u>	1989	CITY OF TOLEDO 3900 SUMMIT ST. TOLEDO, OH 43605
<u>XYLENE (MIXED ISOMERS)</u>	1990	CITY OF TOLEDO 3900 SUMMITT ST. TOLEDO, OH 43605
<u>XYLENE (MIXED ISOMERS)</u>	1998	NA
<u>XYLENE (MIXED ISOMERS)</u>	1999	NA

XYLENE (MIXED ISOMERS)

2000 NA

Non Production Releases:

This facility did not report any Non-Production releases.

The Environmental Defense Fund's (EDF) Chemical Scorecard has on-line environmental information regarding this



facility's reported TRI releases. This information resource is not maintained, managed, or owned by the Environmental Protection Agency (EPA) or the Envirofacts Support Team. Neither the EPA nor the Envirofacts Support Team is responsible for their content or site operation. The Envirofacts Warehouse provides this reference only as a convenience to our Internet users.

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Our Commitment

The packaging of food, beverage, personal care and other consumer goods plays a major role in our daily lives. It protects products from spoilage, ensures product safety from manufacture through storage and distribution through consumption, provides tamper evidence, communicates information, such as nutritional information and serving instructions, and provides the convenience demanded by today's consumers.

We place a high priority on environmental matters. Environmental commitment and pollution prevention are a fundamental part of our business philosophy. We continuously assess areas of potential environmental impact in our manufacturing activities. Today, environmental matters are as much a part of the Company's business plans as marketing, financial, or production considerations. We are committed to policies and business practices aimed at reducing the impact of our manufacturing operations and products on the environment.

Environmental considerations are also paramount in all technological developments ensuring that new products encompass environmental benefits.

Click here for our complete [Environmental, Health & Safety Policy](#).

Environmental, Health & Safety Policy

Crown Cork & Seal is committed to using sound and responsible environmental, health and safety practices and complying with all applicable regulations and Company standards. This policy, and the related Key Principles, demonstrate the Company's commitment to protecting the environment, as well as the health and safety of our employees and is an integral part of World Class Performance. Implementation of this policy is a primary management objective and the responsibility of each Crown employee.

Key Principles

Crown recognizes that the protection of human health and the environment is a sound business practice that conserves resources and safeguards employees, customers, the general public and the

environment. Each of us share this responsibility to ensure our long term success.

To implement our policy, we will:

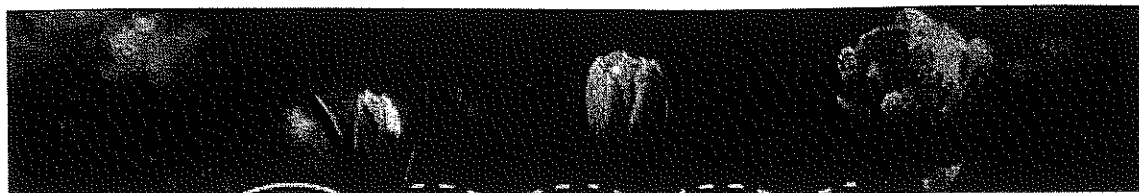
- Commit to leadership by operating our businesses in conformance with all regulatory requirements and Crown's environmental, health and safety standards and policies.
- Strengthen our proactive environmental, health and safety culture by increasing awareness and knowledge among all levels of employees and commit to the protection and well-being of each employee.
- Promote pollution prevention with an emphasis on source reduction and resource conservation and include environmental, health and safety considerations among the criteria by which projects, products, processes and purchases are evaluated.
- Require each employee to take responsibility for the environmental, health and safety performance and security of themselves, fellow employees and the Company.
- Assess our environmental, health and safety performance and programs and commit to continuous improvement towards our target goals of zero accidents and zero impacts.

For more information about Crown Cork & Seal's Environment, Health & Safety policy and programs, contact:

Corporate EHS Department
Crown Cork & Seal Company, Inc.
One Crown Way
Philadelphia, PA 19154-4599
Phone: (215) 698-5100

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Environment

Over the past decades, the protection of the environment has become a major concern for individuals and corporations alike. In some countries, a great amount of progress has been achieved in limiting or eliminating the causes and effects of pollution, waste accumulation and the degradation of nature. However, much remains to be done.

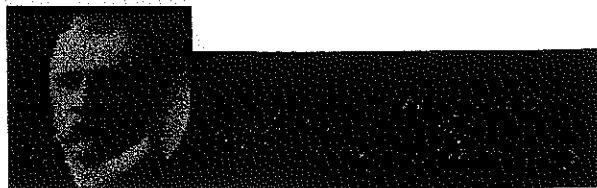
Crown Cork & Seal's primary business mission is the transformation of raw materials into finished packaging products, which serve the needs of the consumer, including a desire for convenience. Preserving the environment has always been a priority for us. We are fully aware that packaging, indispensable as it is for preserving food, beverage and other products, needs to be considered under the aspects of environmental protection as well.

In line with these important issues and our overall responsibility toward society, we at Crown Cork & Seal are concerned with environmental issues and have implemented many programs to minimize our impact on the environment.

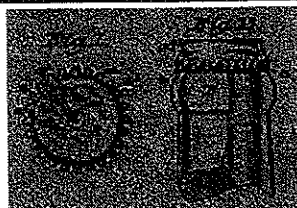
In this section, you will discover our corporate policy on Environment, Health & Safety, which describes the guidelines and principles by which we operate. In recent years, Crown Cork & seal has stepped up its environmental commitment significantly. Our actions go beyond regulatory compliance and we have implemented many voluntary programs over the past few years. Our demonstrated stewardship has been widely recognized by the Environmental Protection Agency (EPA) and other regulatory agencies. As a result, Crown Cork & Seal has won numerous awards recognizing our leadership in protecting the world around us.

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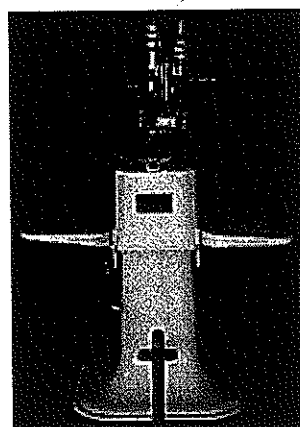
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1892

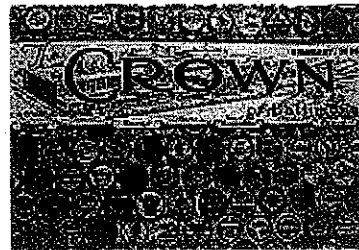


1898



1906

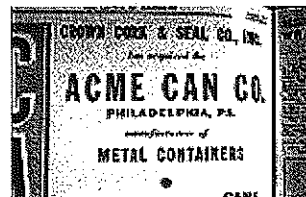
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1927



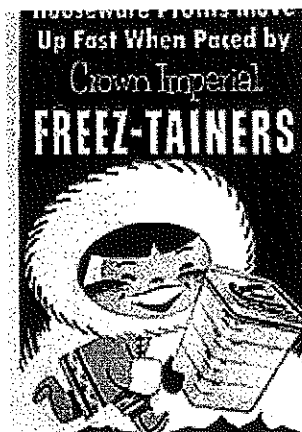
1930s



1937



1941-1945



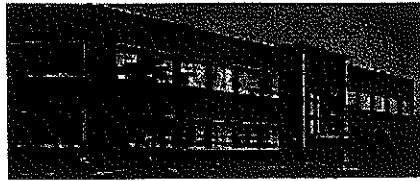
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1957



1958

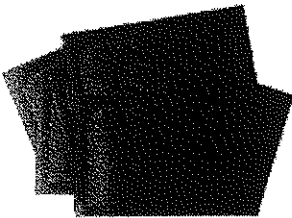


1960

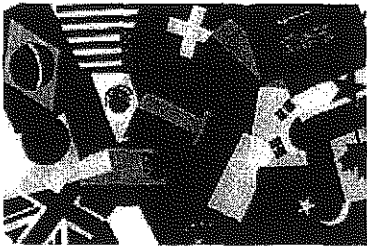
1969



1970s



1977



1989



1990



1992



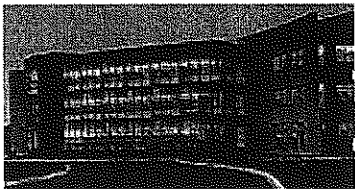
1993



1996



1997



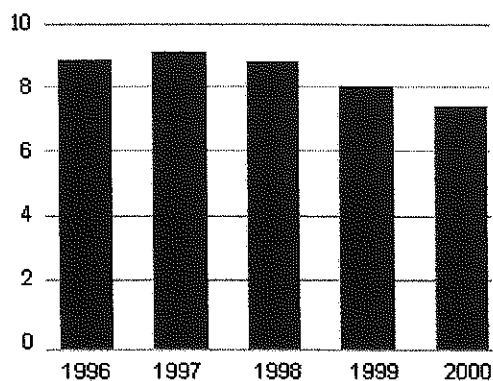
[Copyright](#)

[Legal Disclaimer](#)

Key Figures

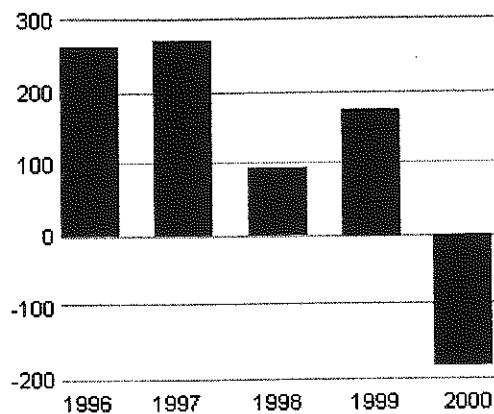
Net Sales

(Dollars in billions)



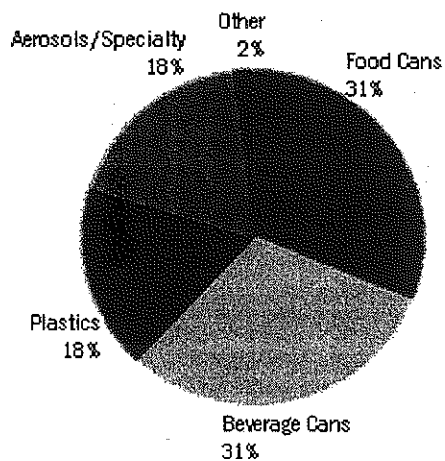
Net Income

(Dollars in millions)



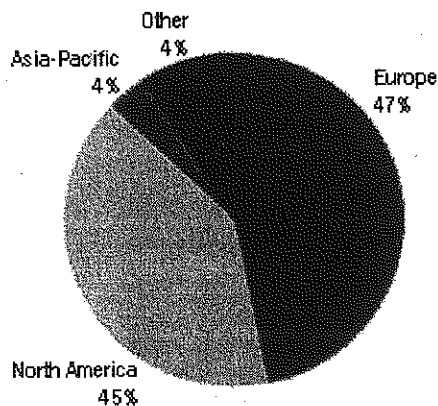
2000 Net Sales

by Product

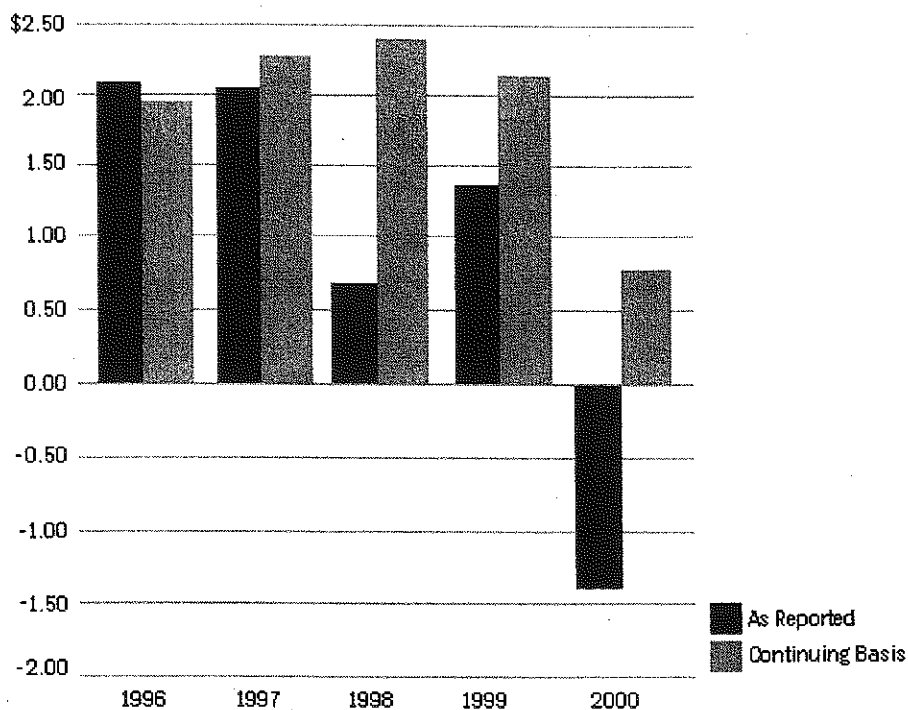


2000 Net Sales

by Geography



Earnings-per-Share



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Legal Disclaimer



Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request

Facility: Crown Cork & Seal Company, Inc.
5201 Enterprise Boulevard
Toledo, Ohio 43612-3808

U.S. EPA ID# OHD 042 159 285

Assigned Staff: Michael Beedle Phone: 37922

Name	Signature	Date
Author	Michael Beedle <i>MB</i>	November 20, 2002
Regional Counsel	<i>AD 4/comm</i>	<i>12/6/02</i>
Section Chief	<i>R</i>	<i>12-17-02</i>

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
7001 0320 0006 0177 3173
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

*Few changes
done
12-10-02*

SEP 12 1989

5HR-12

Michael Savage, Manager
RCRA Enforcement Section
Division of Solid & Hazardous Waste Management
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43266-0149

Re: Land Ban Inspection
for Kaiser Aluminum

OHD-042-159-285

Dear Mr. Savage:

Enclosed is the inspection checklist you sent us for Kaiser aluminum in Toledo, Ohio. We find that the inspection checklist is incomplete, particularly page 15 and beyond. My staff has been in contact with Mr. Don North of the Northwest District Office, but apparently this matter cannot be resolved. Since we cannot take action, I am returning the inspection checklist to you. I've directed my staff to delete from HWDMS the land ban inspection currently listed for this facility on May 1, 1989.

If you have any questions on this matter, please contact me at (312) 886-4454.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

5HR-12 budich::pw:6-8093::DISK "A" #:FILENAME: savage

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	ab 9-8-89	SKS 9/12/89	

J. Munkit
9/11/89

compliance file

KAISER
ALUMINUM

KAISER ALUMINUM & CHEMICAL CORPORATION

August 3, 1989

Mr. William E. Muno, 5HR-12
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY
Region 5
230 South Dearborn St.
Chicago, IL 60604

Registered Mail
No. P 282 501 517
Return/Receipt
Mailed 8/03/89

RECEIVED
AUG 7 - 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 5

RE: Kaiser Aluminum & Chemical Corp.
Toledo Works - 5201 Enterprise Blvd.
Accumulation Time Extension
OHD 042 159 285

Dear Mr. Muno:

This letter verifies that the waste was removed from our facility within 120 days from the date of accumulation based on the attached hazardous waste manifest. You requested this verification in your letter of July 11, 1989.

Thank you for the extension to the 90 day limit.

Sincerely yours,

KAISER ALUMINUM & CHEMICAL CORP.

D. T. Christian

Daniel T. Christian
Staff Engineer

DTC:jah

cc: M. Savage, OEPA
J. Steers, NWDO

N. Wells, KACC Toledo
W. Prior, KACC Baton Rouge Env. Ofc.

Enc.



MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A.
1979, as amended and Act 136, P.A.
1969.

Failure to file is punishable under
section 299.548 MCL or Section 17 of
Act 136, P.A. 1969.

Form Approved. OMB No. 2050-0039 Expires 9-30-88

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address Kaiser Aluminum & Chemical Corp. Attn: Dan Christian 5201 Enterprise Blvd., PO Box 928 Toledo, Ohio 43612						A. State Manifest Document Number MI 1337134									
4. Generator's Phone (419) 727-1227						B. State Generator's ID									
5. Transporter 1 Company Name Cousins Waste Control Corp.						C. State Transporter's ID									
6. US EPA ID Number OH 066 081 595						D. Transporter's Phone 419/726-1500									
7. Transporter 2 Company Name						E. State Transporter's ID									
8. US EPA ID Number						F. Transporter's Phone									
9. Designated Facility Name and Site Address Michigan Disposal, Inc. 49350 N. Service Drive Bellefonte, Michigan 48111						G. State Facility's ID									
10. US EPA ID Number MI 000 724 831						H. Facility's Phone									
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		I. Waste No. N/H			
a. RQ-1000 Waste Chromic Acid Solution Corrosive Material (D002) UN 1755						22 DR		01210		G		D002 H			
b.															
c.															
d.															
J. Additional Descriptions for Materials Listed Above a.1 May contain trace amount of hydrofluoric acid UN 1790 wash out water, sludge & scale from aluminum metal treatment. HPI Approval #52568						K. Handling Codes for Wastes Listed Above a/ / b/ / c/ / d/ /									
15. Special Handling Instructions and Additional Information Corrosive liquid and solid with low PH Wear protective clothing when handling.															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name D. J. Christian						Signature <i>D. J. Christian</i>						Date 07/14/87			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Gary Brindle						Signature <i>Gary Brindle</i>		Date 07/14/87	
18. Transporter 2 Acknowledgement or Receipt of Materials						Printed/Typed Name						Signature		Date	
19. Discrepancy Indication Space 65858															
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						Printed/Typed Name T. H. ...						Signature <i>T. H. ...</i>		Date 07/14/87	

JUL 11 1989

Mr. Daniel T. Christian
Environmental Manager
Kaiser Aluminum Chemical Corporation
P.O. Box 928
Toledo, Ohio 43694

Re: Accumulation Time Extension
Kaiser Aluminum & Chemical Corp.
OHD 042 159 285

Dear Mr. Christian:

This is in regard to your letter of June 30, 1989, to the Regional Administrator requesting an extension of time to the 90-day accumulation time restriction for generators of hazardous waste.

In accordance with 40 CFR 262.34(b) an extension of time of up to thirty (30) days may be granted on a case-by-case basis to generators that due to unforeseen, temporary or uncontrollable circumstances must retain hazardous waste at their facility beyond the 90-day accumulation time limit. After reviewing your letter, we hereby grant a thirty (30) day extension to the 90-day accumulation period. Please provide this office with verification in the form of a signed manifest from the disposal facility that the waste was removed from the facility within 120 days from the date accumulation began.

Sincerely yours,

**ORIGINAL SIGNED BY
WILLIAM E. MUNO**

William E. Muno, Chief
RCRA Enforcement Branch

cc: Mike Savage, OEPA
Jeff Steers, NWDO

bcc: Sally Swanson, REB
diskette #1 daniel gordon/walker 7/7/89

ap 7/11/89

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/VI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/VI ENF. PROG. SECTION	IN/MN/OH ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O. R. A.D.D.	WMD DIR
INIT. DATE		JS 7/10/89					PTC OR SCS 7/10/89	WEM 7/4/89		



K A I S E R A L U M I N U M & C H E M I C A L C O R P O R A T I O N

June 30, 1989

O. WMD
CC: RF
CERT P 282 501 525

REGIONAL ADMINISTRATOR
US EPA REGION 5
230 Dearborn
Chicago, IL 60604

Registered Mail: P282501525
Receipt/Return
Mailed 6/30/89

Dear Sir:

This confirms my phone conversation with Mr. Jeff Steers, Ohio EPA, Bowling Green, Ohio. We request an extension to 90 day storage limit for twenty-one drums containing tank clean out sludges. These sludges were generated for the first time at this plant. Each drum required characterization.

We worked with our contract waste hauler, Cousins Waste Management, who sampled the drums, had the wastes characterized and scheduled a disposal site. Both the characterization and disposal schedule were delayed because of backlog of workload at both the lab and the disposal site according to the waste hauler.

We currently are scheduled to have the sludge picked up next Wednesday, July 6, 1989. It was thought that the sludge could be disposed of by today but this has not been possible. I did try to contact Ohio EPA yesterday about this.

Thank you for your consideration.

Sincerely yours,

KAISER ALUMINUM AND CHEMICAL CORP.

Daniel T. Christian
Environmental Mgr.

DTC:jah

cc: Dr. Richard Shank
Ohio EPA Director
P.O. Box 1049
Columbus, OH 43266-0149

Norm Wells
KACC, Toledo

Mr. Jeff Steers
Northwest Ohio EPA
Bowling Green, OH

William Prior
Baton Rouge Envir. Af. Of.

RECEIVED

JUL 3 1989

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

RECEIVED

JUL 6 1989

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: KAISED ALUMINUM

U.S. EPA I.D. No.: OHDC42159085

Street: 5201 ENTREPRENEUR BLVD

City: TOLEDO State: OH Zip Code: 43612

Telephone: _____

Operator: Same

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Same

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 5/1/89 Time: _____ Weather Conditions: _____

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>RICH DEESCHER</u>	<u>OEPA</u>	<u>(419) 352-8461</u>

Facility Representatives: MR DAN CHRISTIAN

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status California List</u>	<u>First Third</u>
Generator	<u>X</u>	<u>X</u>	_____	<u>X</u>
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	_____	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	<u> X </u>	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	<u> X </u>	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

C. First Thlr Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	<u>X</u> _____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

APP

	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>F019</u>	<u> </u>	<u><input checked="" type="checkbox"/></u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

Spent Solvent F003, 5

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream:

Spent Solvent F003, 5

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: FO19 WWT Sludge

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ^{< 90 days} ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

- c. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: Enviroate, Petrochem

- d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☐ No

- e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

- f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

- h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards
and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the
prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for
a period of 5 years?

☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment
and recovery facilities that provide treatment that yields the
greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a
demonstration and certification containing the following information
to document its efforts to locate practically available treatment:

A list of facilities and facility
officials contacted? ☐ Yes ☐ No

Addresses ☐ Yes ☐ No

Telephone Numbers ☐ Yes ☐ No

Contact dates ☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available
treatment for its wastes, has it sent documentation to EPA
demonstrating why it was not able to obtain treatment or recovery
for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?
- o F-solvent ☐ Yes ☐ No ☐ NA
- o California List ☐ Yes ☐ No ☐ NA
- o First Third ☐ Yes ☐ No ☐ NA
2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☐ No

a. What date was the waste analysis plan last revised? _____

b. Are analyses conducted on-site or off-site?

☐ On-site ☐ Off-site

Identify off-site lab: _____

c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☐ NA

d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

_____ Yes _____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

_____ Yes _____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

_____ Tanks
_____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

_____ Yes _____ No _____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

_____ Yes _____ No

5. Do operating records agree with container labeling?

_____ Yes _____ No _____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

_____ Yes _____ No

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

_____ Yes _____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

_____ Yes _____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

_____ Tanks
_____ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

_____ Yes _____ No _____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

_____ Yes _____ No

5. Do operating records agree with container labeling?

_____ Yes _____ No _____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

_____ Yes _____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ____ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

___ Yes ___ No
___ Yes ___ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

___ Yes ___ No
___ Yes ___ No
___ Yes ___ No
___ Yes ___ No
___ Yes ___ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

___ Yes ___ No

If yes, list the constituents.

- (b) Are the constituents used for degreasing/cleaning?

___ Yes ___ No

If yes, list the constituents.

- (c) Are the constituents used as diluents?

___ Yes ___ No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

___ Yes ___ No

If yes, list the constituents.

(e) Are the constituents used for fabric scouring?

____Yes ____No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

____Yes ____No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ____Yes ____No
8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
68%	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
51%	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	0.44	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

APPENDIX C

DETAILED DESCRIPTION OF FIRST THIRD WASTE CODES

§ 261.31 Wastes

F006—Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.

F007—Spent cyanide plating bath solutions from electroplating operations.

F008—Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process.

F009—Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.

F019—Wastewater treatment sludges from the chemical conversion coating of aluminum.

§ 261.32 Wastes

K001—Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.

K004—Wastewater treatment sludge from the production of zinc yellow pigments.

K008—Over residue from the production of chrome oxide green pigments.

K011—Bottom stream from the wastewater stripper in the production of acrylonitrile.

K013—Bottom stream from the acetonitrile column in the production of acrylonitrile.

K014—Bottoms from the acetonitrile purification column in the production of acrylonitrile.

K015—Still bottoms from the distillation of benzyl chloride.

K016—Heavy ends or distillation residues from the production of carbon tetrachloride.

K017—Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.

K018—Heavy ends from the fractionation column in ethyl chloride production.

K019—Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.

K020—Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.

K021—Aqueous spent antimony catalyst waste from fluoromethanes production.

K022—Distillation bottom tars from the production of phenol/acetone from cumane.

K024—Distillation bottoms from the production of phthalic anhydride from naphthalene.

K025—Distillation bottoms from the production of nitrobenzene by the nitration of benzene.

K030—Column bottom or heavy ends from the combined production of trichloroethylene and perchloroethylene.

K031—By-products salts generated in the production of MSMA and cacodylic acid.

K035—Wastewater treatment sludges generated in the production of creosote.

K036—Still bottoms from toluene reclamation distillation in the production of disulfoton.

K037—Wastewater treatment sludge from the production of disulfoton.

K044—Wastewater treatment sludges from the manufacturing and processing of explosives.

K045—Spent carbon from the treatment of wastewater containing explosives.

K046—Wastewater treatment sludges from the manufacturing, formulation and loading of lead-based initiating compounds.

K047—Pink/red water from TNT operations.

K048—Dissolved air flotation (DAF) float from the petroleum refining industry.

K049—Stop oil emulsion solids from the petroleum refining industry.

K050—Heat exchange bundle cleaning sludge from the petroleum refining industry.

K051—API separator sludge from the petroleum refining industry.

K052—Tank bottoms (lead) from the petroleum refining industry.

K060—Ammonia still lime sludge from coking operations.

K061—Emission control dust/sludge from the primary production of steel in electric furnaces.

K062—Spent pickle liquor from steel finishing operations in chlorine production.

K069—Emission control dust/sludge from secondary lead smelting.

K071—Brine purification muds from the mercury cells process in chlorine production, where separately prepurified brine is not used.

K073—Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes.

K083—Distillation bottoms from aniline production.

K084—Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K085—Distillation of fractionation column bottoms from the production of chlorobenzenes.

K086—Solvent washes and sludges; caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.

K087—Decanter tank tar sludge from coking operations.

K099—Untreated wastewater from the production of 2,4-D.

K100—Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting.

K101—Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K102—Residue from the use of activated carbon for decolorization in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K103—Process residues from aniline extraction from the production of aniline.

K104—Combined wastewater streams generated from nitrobenzene/aniline production.

K106—Waste water treatment sludge from the mercury cell process in chlorine production.

§ 261.33(e) Wastes

P001—Warfarin, when present at concentration greater than 0.3%

P004—Aldrin

P005—Allyl alcohol

P010—Arsenic acid

P011—Arsenic (V) oxide

P012—Arsenic (III) oxide

P015—Beryllium dust

P016—Bis-(chloromethyl) ether

P018—Brucine

P020—Dinoseb

P030—Soluble cyanide salts not elsewhere specified

P036—Dichlorophenylarsine

P037—Dieldrin

P039—Disulfoton

P041—Diethyl-p-nitrophenyl phosphate

P048—2,4-Dinitrophenol

P050—Endosulfan

P058—Fluoroacetic acid, sodium salt

P059—Heptachlor

P063—Hydrogen cyanide

P068—Methyl Hydrazine

P069—Methyl lactonitrile

P070—Aldicarb

P071—Methyl parathion

P081—Nitroglycerine

P082—N-Nitrosodimethylamine

P084—N-Nitrosomethylvinylamine

P087—Osmium tetroxide

P089—Parathion

P092—Phenylmercuric acetate

P094—Phorate

P097—Famphur

P102—Propargyl alcohol

P105—Sodium azide

P108—Strychnine and salts

P110—Tetraethyl lead

P115—Thallium (I) sulfate

P120—Vanadium pentoxide

P122—Zinc phosphide, when present at concentrations greater than 10%

P123—Toxaphene

§ 261.33(f) Wastes

U007—Acrylamide

U009—Acrylonitrile

U010—Mitomycin C

U012—Aniline

U016—Benz(c)acridine

U018—Benz(a)anthracene

U019—Benzene

U022—Benzo(a)pyrene

U029—Methyl bromide

U031—n-Butanol

U036—Chlordane, technical

U037—Chlorobenzene

U041—n-Chloro-2,3-epoxypropane

U043—Vinyl chloride

U044—Chloroform

U046—Chloromethyl methyl ether

U050—Chrysene

U051—Creosote

U053—Crotonaldehyde

U061—DDT

U063—Dibenz o (a, h) anthracene

U064—1,2,7,8 Dibenzo pyrene

U066—Dibromo-3-chloropropane 1,2-

U067—Ethylene dibromide

U074—1,4-Dichloro-2-butene

U077—Ethane, 1,2-dichloro-

U078—Dichloroethylene, 1,1-

U086—N,N Diethylhydrazine

U089—Diethylstilbestrol

U103—Dimethyl sulfate

U105—2,4-Dinitrotoluene

U108—Dioxane, 1,4-

U115—Ethylene oxide

U122—Formaldehyde

U124—Furan

U129—Lindane

U130—Hexachlorocyclopentadiene

U133—Hydrazine

U134—Hydrofluoric acid

U137—Indeno(1,2,3-cd)pyrene

U151—Mercury

U154—Methanol

U155—Methapyrilene

U157—3-Methylcholanthrene

U158—4,4-Methylene-bis-(2-chloroaniline)

U159—Methyl ethyl ketone

U171—Nitropropane, 2-

U177—N-Nitroso-N-methylurea

U180—N-Nitrosopyrrolidine

U185—Pentachloronitrobenzene

U188—Phenol

U192—Pronamide

U200—Reserpine

U209—Tetrachloroethane, 1,1,2,2-

U210—Tetrachloroethylene

U211—Carbon tetrachloride

U219—Thiourea

U220—Toluene

U221—Toluenediamine

U223—Toluene diisocyanate

U226—Methylchloroform

U227—Trichloroethane, 1,1,2-

U228—Trichloroethylene

U237—Uracil mustard

U238—Ethyl carbamate

U248—Warfarin, when present at concentrations of 0.3% or less

U249—Zinc phosphide, when present at concentrations of 10% or less